

# AMERICANS WITH DISABILITIES ACT SELF-EVALUATION AND TRANSITION PLAN

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Medfield, Massachusetts

Community Opportunities Group, Inc.



KMA ARCHITECTURE + ACCESSIBILITY



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APPENDIX

## TITLES OF THE ADA

The PURPOSE of the ADA is to make American life accessible to people with disabilities

### EMPLOYMENT

Prohibits discrimination in employment on the basis of ability

### PUBLIC SERVICES

Prohibits discrimination in state and local government and public transportation on the basis of ability

### PUBLIC ACCOMMODATIONS

Requires that existing and new public accommodations (hotels, restaurants, stores, etc.) are accessible to individuals with disabilities

### COMMUNICATIONS

Mandates that telecommunications companies provide telephone relay services to individuals with disabilities

### MISCELLANEOUS

Prohibits coercion, threatening, or retaliation against individuals with disabilities or those attempting to aid people with disabilities in asserting their rights under the ADA

# INTRODUCTION

## WHAT IS THE ADA?

The Americans with Disabilities Act (ADA) is federal law that became effective in 1991, and was amended in 2008 to expand the definition of disability. It is a civil rights law that provides for, and protects, equal opportunity for individuals with disabilities. The ADA prohibits discrimination in access to jobs, public accommodations, government programs and services, public transportation, and telecommunications. The ADA does not communicate a socially responsible perspective for inclusion, but instead, it represents a federal mandate to protect the rights of any individual who lives with a disability. The ADA also corresponds with the Rehabilitation Act, Section 504. Under the Rehabilitation Act, public agencies who receive federal funding must comply with all laws pertaining to accessibility.

## WHAT IS A SELF-EVALUATION AND TRANSITION PLAN?

The Town of Medfield is required to conduct an ADA Self-Evaluation and Transition Plan. The Plan is an assessment of the level of ADA compliance and an action plan for improving accessibility. The Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act require this Plan to include:

- Identification of the ADA Coordinator responsible for implementation
- Adoption of grievance procedures
- An inventory of barriers - known as a 'self-evaluation'
- A schedule and methods to be used for barrier removal
- Public involvement & notice





# TITLE II OF THE ADA

## LOCAL GOVERNMENT



### Programs, Services & Facilities

- Must be accessible when viewed in their entirety
- Most integrated setting possible is required
- Barriers are not only physical



### Employment Activities

- Eligibility Criteria
- Essential Job Functions
- Reasonable Modifications



### Communications

- Effective Communications
- Auxiliary Aids & Services
- Person-First Language
- Appropriate Behavior

Title II of the ADA covers the programs, activities, and services of public entities, which include any State or local government and any of its departments, agencies, or other instrumentalities. The purpose of Title II is to eliminate ability related discrimination in State and local government, and works in combination with Section 504 of the Barriers Removal Act and other important civil rights laws.

### SUBTITLE A OF TITLE II

Subtitle A is intended to protect qualified individuals with disabilities from discrimination on the basis of disability in the services, programs, or activities of all State and local governments.

### SUBTITLE B OF TITLE II

Subtitle B covers public transportation services operated by State and local governments. Department of Transportation regulations establish specific requirements for the operation of public transit systems, including commuter (MBTA) and intercity rail (AMTRAK).

### TITLE II OBLIGATIONS

The basic mandate of Title II is that no qualified individual with a disability shall be excluded from participation, be denied benefits, services or goods, be denied access to programs or activities, including employment or be subject to discrimination in State and local government.

Furthermore, people with disabilities must not be denied an equal opportunity to participate and benefit from programs and services. The opportunity must be equal to and as effective as the opportunity provided to others. The requirement to provide equal opportunity extends not only to physical access at government facilities, programs, and events -- but also to policy changes that governmental entities must make to ensure that all people with disabilities can take part in, and benefit from, the programs, services and activities of State and local governments.

In addition, governmental entities must ensure effective communication -- including the provision of necessary auxiliary aids and services -- so that individuals with disabilities can participate in civic life.





# GLOSSARY OF TERMS

## Architectural Barriers

Obstacles or other features in the built environment that impede individuals with disabilities from gaining full and complete access to the goods and services being provided.

## Disability

A physical, intellectual, sensory, or psychological impairment that substantially limits a major life activity, such as walking, seeing, hearing, learning, breathing, caring for oneself, or working. A disability can be chronic or intermittent, fluctuating, progressive or stable, and visible or invisible. Individuals participating in addiction recovery are also considered to be disabled. The ADA protects three classes of people with disabilities:

- those who have a disability,
- those who have a record of having a disability, and
- those who are regarded as having a disability, whether or not they actually have one.

## Discrimination

Discrimination is the act of making unjustified distinctions between human beings based on the groups, classes, or other categories to which they are perceived to belong. Discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and all public and private places that are open to the general public is illegal under the ADA.

## Essential Job Functions

Fundamental job duties of the employment position the individual with a disability holds or desires. The term "essential functions" does not include the marginal functions of the position.

- A job function may be considered essential for any of several reasons, including but not limited to the following:
  - The function may be essential because the reason the position exists is to perform that function;
  - The function may be essential because of the limited number of employees available among whom the performance of that job function can be distributed; and/or
  - The function may be highly specialized so that the incumbent in the position is hired for his or her expertise or ability to perform the particular function.
- Evidence of whether a particular function is essential includes, but is not limited to:
  - The employer's judgment as to which functions are essential;
  - Written job descriptions prepared before advertising or interviewing applicants for the job;
  - The amount of time spent on the job performing the function and the consequences of not requiring the incumbent to perform the function;
  - The terms of a collective bargaining agreement; and/or
  - The work experience of current or past incumbents in the job.

## **Fundamental Alteration**

A modification that is so significant that it alters the essential nature of the goods, services, facilities, privileges, advantages, or accommodations offered. If a public entity can demonstrate that the modification would fundamentally alter the nature of its service, program, or activity, it is not required to make the modification. If a public accommodation (private entity) can demonstrate that a modification would fundamentally alter the nature of the goods, services, facilities, privileges, advantages, or accommodations it provides, it is not required to make the modification.

## **Individual with a Disability**

A person who has a physical or mental impairment that substantially limits one or more of the major life activities of such individual, or a record of such an impairment, or is regarded as having such an impairment.

## **Program Access**

A public entity's services, programs, or activities, when viewed in their entirety, must be readily accessible to and usable by individuals with disabilities.

## **Qualified Individual with a Disability**

An employee or job applicant who meets legitimate skill, experience, education, or other requirements of an employment position that they hold or seek. The person must also be able to perform the "essential" (as opposed to marginal or incidental) functions of the position either with or without reasonable accommodation. Job requirements that screen out or tend to screen out people with disabilities are legitimate only if they are job-related and consistent with business necessity.

## **Readily Achievable**

Easily accomplished and able to be carried out without much difficulty or expense. Public accommodations are required to remove barriers when it is readily achievable to do so.

## **Reasonable Accommodation**

A modification or adjustment to a job, the work environment, or the way things usually are done that enables a qualified individual with a disability to enjoy an equal employment opportunity. For example:

- Modifications or adjustments to a job application process that enable a qualified applicant with a disability to be considered for the position such qualified applicant desires; or
- Modifications or adjustments to the work environment, or to the manner or circumstances under which the position held or desired is customarily performed, that enable a qualified individual with a disability to perform the essential functions of that position; or
- Modifications or adjustments that enable a covered entity's employee with a disability to enjoy equal benefits and privileges of employment as are enjoyed by its other similarly situated employees without disabilities.

## **Undue Hardship**

A public entity does not have to take any action that it can demonstrate would result in an undue financial and administrative burden. This applies in program accessibility, effective communication, and auxiliary aids and services. The determination of an undue financial and administrative burden must be:

1. Made by the head of the public entity or his/her designee.
2. Accompanied by a written statement of the reasons.
3. Based on all resources available for use in the program.



# SECTION 1: ADA OVERVIEW

Like all municipalities, Medfield has a regulatory obligation to ensure that it does not discriminate against individuals with disabilities in the provision of municipal programs and services. The Americans with Disabilities Act (ADA) does not necessarily require that all the Town's facilities are fully accessible. **Rather, it requires that all the Town's programs and services, "when viewed in their entirety" are accessible.** The law provides public entities with some flexibility in how this standard can be met. Both structural and nonstructural methods of providing "**program access**" can be used.

The Town is required to perform a Self-Evaluation to determine the barriers that exist to its programs and services. Then, the Town must develop and implement a plan to remove the barriers. The only limit to the Town's obligation is if an action will result in a fundamental alteration to the program or service or create undue administrative or financial burdens. The decision that compliance would result in such alteration or burdens must be made by the head of the public entity or his or her designee and must be accompanied by a written statement of the reasons for reaching that conclusion. If it is determined that barrier removal will result in such an alteration or burdens, the Town must still, "take any other action that would not result in such an alteration or such burdens but would nevertheless ensure that individuals with disabilities receive the benefits or services provided by the public entity."

**The ADA defines individuals with disabilities as those who fall into one of the following three categories:**

1. Individuals who have a physical or mental impairment that substantially limits one or more major life activities,
2. Individuals with a record of such an impairment; and
3. Individuals regarded as having such an impairment

The broad prohibition against disability-based discrimination requires that all of the Town's programs and services be accessible to individuals with disabilities. Thus, the Town must assess specific services, policies and practices and address the removal of physical barriers and/or the revision of policies and procedures, to ensure compliance with the applicable ADA and Section 504 regulations, and with all provisions of the Massachusetts Code of Regulations (521 CMR). Massachusetts State law further requires that the Town apply the more stringent of the above standards to achieve accessibility.

**The ADA requires a public entity to take five administrative action steps:**

1. Designate an employee responsible for carrying out compliance activities;
2. Provide notice to the public of its rights and protections under the ADA and how the entity complies with those obligations;
3. Establish a grievance procedure;
4. Conduct a Self-Evaluation, a comprehensive review of policies and procedures; and
5. Develop an ADA Transition Plan.

# ADA AND 504 BARRIER REMOVAL REQUIREMENTS

There are two requirements under Title II of the ADA that require a public entity such as the Town to remove existing barriers to bring an end to and to prevent discrimination against a person or people with disabilities. These two requirements are as follows:

- **Program Accessibility** requires that individuals with disabilities be provided an equally effective opportunity to participate in or benefit from a public entity's programs, employment opportunities, and services. The ADA requires that public entities provide physical and communication access to each program service or activity. The Town must identify and correct policies and practices that have the effect of discriminating against individuals with disabilities.
- **Physical Accessibility** requires that a facility be barrier-free. Barriers include any obstacles that prevent or restrict the entrance or use of a facility. Further, the Town is required to maintain its existing facilities to ensure continued, unfettered, and uninterrupted access to persons with disabilities.

## Program Access

The Town's fundamental goal is to ensure that individuals with disabilities are afforded an equally effective opportunity to participate in, or benefit from, all of its programs and services, subject only to the limitations of fundamental alteration and/or undue burden. Therefore, the Town must implement policy changes, if necessary, so that persons with disabilities can have full access. Further, the Town must continue to make changes to prevent discrimination and continually work to increase accessibility.

The ADA's Section 202 states:

**"...No qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity."**

The ADA's Section 204 required that the U.S. Department of Justice (DOJ) promulgate implementing regulations, and adopted 28CFR35 in July, 1991. 28 CFR 35.149 states:

**"...No otherwise qualified individual with a disability shall, because a public entity's facilities are inaccessible to or unusable by individuals with disabilities, be excluded from participation in, or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity."**

Which is further clarified, by 28 CFR 35.150, which states that:

**"A public entity shall operate each service, program, or activity so that the service, program, or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities."**

This statutory and regulatory language above describes what is known as "program access" – all programs must be readily accessible to, and usable by, qualified persons with disabilities. The determination of what is an equal and integrated setting will be made on a case-by-case basis. What is appropriate for one person with a specific impairment may not be useful or appropriate for another person with the same impairment. Failure to provide "program access" is an illegal act of discrimination under Title II of the ADA. The Town must identify and correct policies and practices that have the effect of discriminating against individuals with disabilities.

## Methods of Providing Program Access

Some of the methods the Town may use to provide program access include:

- Reassignment of services to accessible buildings;
- Delivery of services at alternate accessible sites;
- Alteration of existing facilities and construction of new facilities; or
- Any other methods that result in making its services, programs, or activities readily accessible to and usable by individuals with disabilities.

While every building does not have to be accessible, every program does. Methods to provide program access by the town should give priority the most integrated setting as possible, which is determined on a case-by-case basis dependent upon the needs of the disabled individual (or individuals). When choosing a method of providing program access, the Town will give priority to the one which results in the most integrated setting possible and appropriate to encourage interaction among all users.

## Limitations on the Provision of Program Access

The ADA's regulations specify certain clear limitations on a public entity's obligation to provide program access. An entity is not required to perform an action that poses an undue financial or administrative burden or constitutes a fundamental alteration. The threshold for an action constituting an undue burden is a high one for state and local government entities.

In determining undue hardship, factors to be considered include the:

- nature and cost of the accommodation;
- overall financial resources of the facility or facilities involved in the provision of the reasonable accommodation;
- number of persons employed at the facility and the effect on expenses and resources;
- overall financial resources of the covered entity;
- overall size of the covered entity with respect to the number of its employees;
- number, type, and location of its facilities;
- type of operation or operations of the covered entity, including the composition, structure, and functions of the workforce of such entity; and
- geographic separateness, administrative, or fiscal relationship of the facility or facilities in question to the covered entity.

## PHYSICAL ACCESS

Department of Justice regulations set minimal requirements for local government facilities and public accommodations to be readily accessible and usable by individuals with disabilities under the 2010 ADA Standards for Accessible Design. These require that:

**“Each facility or part of a facility constructed by, on behalf of, or for the use of a public entity shall be designed and constructed in such manner that the facility or part of the facility is readily accessible to and usable by individuals with disabilities, if the construction was commenced after January 26, 1992.”**

In addition to those standards, there are four federal and state requirements for architectural barrier removal from existing buildings and in alterations to existing buildings. These are:

- **PL101-336:** 1990 Americans with Disabilities Act (ADA)  
This is the federal civil rights statute whose first purpose is, "...To provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities." (42 USC 12101. Sec.2(b))
- **28 CFR Part 35:** Department of Justice  
Non-discrimination on the Basis of Disability in State and Local Government Services (as amended by the final rule published on September 15, 2010). These are the U.S. Department of Justice's regulations implementing the ADA, as required in 42 USC 12101, Sec.204(a))
- **29 USC 794:** Section 504 of the 1973 *Rehabilitation Act* (504)
- **521 CMR:** The Rules and Regulations of the Massachusetts Architectural Access Board. (1977, 1987, 1990, 1992, 1996, 1998, 2006)

## Section 521: State Building Code Accessibility Regulations

In addition to federal regulations, Section 521 of the Code of Massachusetts Regulations, "521 CMR: Architectural Access Board" is a specialized section of the State Building Code which provides the actual construction standards and specifications which must be adhered to for work performed on "public" buildings (see definition of public building in 521 CMR) in the Commonwealth of Massachusetts. The purpose of 521 CMR is to make public buildings and facilities accessible to, functional for, and safe for use by persons with disabilities. It is the intent of 521 CMR to provide persons with disabilities full, free and safe use of all buildings and facilities so that all such persons may have the educational, living and recreational opportunities necessary to be as self-sufficient as possible and to assume full responsibilities as citizens.

The Massachusetts Architectural Access Board (MAAB) is a regulatory agency whose mandate, as established under M.G.L. c.22 S13A, is to develop and enforce regulations pertaining to public access. The MAAB also decides on variance requests, issues advisory opinions, and makes decisions on complaints. Local building inspectors are responsible for enforcement of the provisions of 521 CMR.

## Applicability of the State Building Code for Accessibility

When a public entity seeks to modify a public building or facility in such a way that requires the issuance of a building permit, the applicability of accessibility access standards found under Sections of 521 CMR, can be triggered depending on the scope of work to be performed.

If the work being performed amounts to less than 30% of the full and fair cash value of the building:

- And costs less than \$100,000: only the work being performed is required to comply with 521 CMR.
- And costs \$100,000 or more: the work being performed is required to comply and an accessible entrance, toilet, telephone and drinking fountain are also required.

If the work performed amounts to 30% or more of the full and fair cash value of the building:

- The entire building is required to comply with 521 CMR.

Where the cost of constructing an addition to a building amounts to 30% or more of the full and fair cash value of the existing building:

- Both the addition and the existing building must be fully accessible.

Buildings and facilities eligible for inclusion on the National or State Registers of Historic Places or are designated as historic in accordance with Massachusetts General Laws Ch. 40C, may apply for a variance, or variances from 521 CMR by the Massachusetts Architectural Access Board to allow for alternative methods to achieve compliance. The granting of such a variance is not compulsory, and careful study and consideration should be given to methods to achieve compliance that are compatible with both the goals of historic preservation and equal access and opportunity.

## Alterations to Historic Properties

### ADA 2010 Standards

There are exceptions for *alterations* to qualified historic buildings and facilities for *accessible routes* (206.2.1 Exception 1 and 206.2.3 Exception 7); entrances (206.4 Exception 2); and toilet facilities (213.2 Exception 2). When an entity believes that compliance with the requirements for any of these elements would threaten or destroy the historic significance of the building or facility, the entity should consult with the State Historic Preservation Officer. If the State Historic Preservation Officer agrees that compliance with the requirements for a specific element would threaten or destroy the historic significance of the building or facility, use of the exception is permitted.

Public entities have an additional obligation to achieve program *accessibility* under the Department of Justice ADA regulations (See 28 CFR 35.150). These regulations require public entities that operate historic preservation programs to give priority to methods that provide physical access to individuals with disabilities. If *alterations* to a qualified historic building or facility to achieve program *accessibility* would threaten or destroy the historic significance of the building or facility, fundamentally alter the program, or result in undue financial or administrative burdens, the Department of Justice ADA regulations allow alternative methods to be used to achieve program *accessibility*. In the case of historic preservation programs such as an historic house museum, alternative methods include using audio-visual materials to depict portions of the house that cannot otherwise be made *accessible*. In the case of other qualified historic properties, such as an historic government office building, alternative methods include relocating programs and services to *accessible* locations. The Department of Justice ADA regulations also allow public entities to use alternative methods when altering qualified historic buildings or facilities in the rare situations where the State Historic Preservation Officer determines that it is not feasible to provide physical access using the exceptions permitted in Section 202.5 without threatening or destroying the historic significance of the building or facility. See 28 CFR 35.151(d).



**Dwight-Derby House**

Source: Medfield Historical Society

### Massachusetts Historic Preservation Regulations

An historic building or facility that is listed or is eligible for listing in the National or State Register of Historic Places or is designated as historic under appropriate state or local laws may be granted a variance by the Architectural Access Board to allow alternative accessibility. If a variance is requested on the basis of historical significance, then consultation with the Massachusetts Historical Commission is required in order to determine whether a building or facility is eligible for listing or listed in the National or State Register of Historic Places. The Massachusetts Historical Commission may request a copy of the proposed variance request and supporting documentation to substantiate the variance request and its effect on historic resources. A written statement from the Massachusetts Historical Commission is required with the application for a variance.



# TRANSITION PLAN

Public entities under the ADA must conduct an evaluation of current services, policies, and practices, and the effects thereof, that do not or may not meet the requirements for non-discrimination, and identify modifications necessary for compliance. Interested persons, including individuals with disabilities or organizations representing individuals with disabilities must be provided an opportunity to participate in the self-evaluation process by submitting comments. (ADA Title II, 28 CFR 35.105)

Where the Town's Self Evaluations determine that structural changes are required to provide program access, the ADA requires that a Transition Plan be developed that establishes the planned barrier removal. The plan is required to:

- Identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities;
- Describe in detail the methods that will be used to make the facilities accessible;
- Specify the schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the Transition Plan is longer than one year, identify steps that will be taken during each year of the transition period; and
- Indicate the official responsible for implementation of the plan.

A copy of the Transition Plan is required to be made available for public inspection. Public entities must establish a system for periodic evaluation and to continually update their self-evaluations to reflect completed work or to detail remediation efforts.

If the Town receives federal funds, it was required in 1980 to develop a similar Transition Plan to achieve program accessibility under Section 504 of the Rehabilitation Act. Under 504, structural or architectural barriers to program access identified in the 504 Transition Plan were to be removed by 1983.

The ADA Transition Plan requirement was intended as an update of the 504 Plan to cover any new programs and services not covered and made accessible under the Section 504 Barrier Removal Program. The ADA requires public entities either to supplement their 504 Transition Plans or replace them with ADA Transition by July, 1992.

## SCHEDULE FOR PROGRAM ACCESS COMPLIANCE

28 CFR 35.150 sets a time period for ADA compliance stating:

**Where structural changes in facilities are undertaken to comply with the obligations established under this section, such changes shall be made within three years of January 26, 1992, but in any event as expeditiously as possible.**

Both 504 and Title II of the ADA presume that people with disabilities will be using the programs and services of public entities. In anticipation, they both mandate proactive steps to prevent discrimination by removing existing barriers. Public entities are not permitted to wait until a person with a disability arrives to begin to make accommodations. Section 504 and Title II mandate proactive barrier removal so that when a student with a disability arrives at school, the programs and services are substantially accessible. Minor accommodations may be needed, but the significant assessment and barrier removal should be complete.





## SECTION 2: REGULATORY CONTEXT

While Title II of the ADA protects persons with disabilities from discrimination in nearly all municipal jurisdictions, this Section is intended to give an overview of the regulatory context in which Section 504 of the Rehabilitation Act and the Americans with Disabilities Act expand rights vested in several key pieces of civil rights legislation:

### Civil Rights Act of 1964

The Act outlawed discrimination based on race in federal employment, federally funded programs and in public accommodations, and provided the model for future legislation protecting persons with disabilities.

### Architectural Barriers Act of 1968

The Act required that federal buildings and buildings constructed with federal funding be accessible to people with disabilities. The law established the Uniform Federal Accessibility Standards (UFAS), which set the standards for barrier removal.

### Rehabilitation Act of 1973

This law required that federally funded programs be accessible to people with disabilities and that federal employers provide reasonable accommodations for their employees with disabilities.

### Individuals with Disabilities Education Act (IDEA) of 1975

This law established the rights of students with disabilities to a public education in as integrated of a setting as possible, for free. It established the process to create Individualized Education Plans (IEPs) for students with disabilities.

### Voting Accessibility for the Elderly and Handicapped Act of 1984

This Act required that polling places across the United States be physically accessible to people with disabilities for federal elections. Where no accessible location is available to serve as a polling place, a political subdivision must provide an alternate means of casting a ballot on the day of the election. This law also requires states to make available registration and voting aids for disabled and elderly voters, including information provided by TTYs or similar devices.

### Air Carrier Access Act (ACAA) of 1986

The ACAA was passed in response to a Supreme Court decision that found that the Rehabilitation Act did not apply to air travel, and requires that air travel be accessible to persons with disabilities.

### Fair Housing Act of 1968, as amended in 1988

The Fair Housing Act is Title II of the Civil Rights Act of 1968. This law was amended in 1988 to include persons with disabilities, making it illegal to discriminate in any aspect of housing because of disability. The Act requires owners of housing facilities to make reasonable exceptions in their policies and operations to afford people with disabilities equal housing opportunities, and to allow tenants with disabilities to make reasonable access-related modifications to their private living space, as well as to common use spaces. The Act further requires that new multifamily housing with four or more housing units be designed and built to allow access for persons with disabilities.

### Section 508 of the Rehabilitation Act

In 1998, eight years after the ADA was passed by Congress, an amendment was passed that required increased access to electronic and information technology for people with disabilities. This law provided for changes in Federal purchasing of information technology and increased access to Federal Internet sites.

# CIVIL RIGHTS & NON-DISCRIMINATION

The fundamental purpose of civil rights legislation is to protect individuals from receiving unfair and/or unequal treatment in key areas of American life and provide an avenue for recourse for those who have experienced discriminatory treatment. The general principle underlying non-discrimination in the ADA and associated regulations is to provide equal opportunity and protect the civil rights of people with disabilities so that they may benefit from employment, services, programs and activities provided to all people by state and local governments. There are eight primary non-discrimination requirements:

## Equal Opportunity

People with disabilities must have an equal opportunity to participate in the programs, services and activities offered by the Town. This means that any barriers to their opportunity to participate must be removed to the maximum extent possible. This requirement extends beyond assuring physical access to the facility itself and includes such things as **effective communications** or making physical modifications to the facility.

This obligation extends to all programs, services, activities and goods offered, but not every facility operated by a public entity needs to be fully accessible if the programs, services and activities offered in the inaccessible facility are also offered, equally conveniently, in other facilities that are accessible.

## Integrated Settings

Programs, services and activities must be provided to people with disabilities in the **most integrated setting to the maximum extent feasible**. The "integration mandate" of the Americans with Disabilities Act (ADA) provides that segregation and isolation are forms of discrimination and should be avoided to achieve equal opportunity. Therefore, individuals with disabilities must be integrated to the maximum extent possible. Furthermore, persons with disabilities cannot be required to participate in a separate program or accept separate benefits; however, separate programs are permitted when necessary to ensure equal opportunity.

## Reasonable Modifications to Policies, Practices or Procedures

Reasonable modification to policies, practices or procedures must be made when necessary to ensure equal opportunity, unless to do so would fundamentally alter the nature of the program, service or activity. The Town must ensure that there are provisions for alternative access and/or reasonable modifications for individuals with disabilities.

## Surcharges and Additional Requirements

Additional charges may not be imposed on people with disabilities to cover the costs of providing them with ADA-mandated access to goods and services. **Surcharges for the provision of auxiliary aids and services, barrier removal, alternatives to barrier removal and/or other modifications to provide an equal opportunity to people with disabilities are prohibited.**

## Eligibility Criteria

Eligibility criteria that tend to screen out people with disabilities may not be used unless necessary for the provision of services or activities. Some eligibility criteria are obviously and inherently discriminatory.

## Contracting and Licensing

The Town may not discriminate on the basis of disability in procurement contracts. Title II also requires public entities to ensure that contractors operating services and programs on their behalf meet the same level of compliance that would be required of the public entity if they were operating the services and programs directly themselves.

The Town may not establish requirements for the programs or activities of licensees that would result in discrimination against qualified individuals with disabilities. A **qualified individual with a disability**, with respect to licensing or certification, is one who meets the essential eligibility requirements for receiving the license or certification. The Town is not required to eliminate or lower licensing standards that are essential in order to accommodate a person with a disability.

## Methods of Administration

The Town may not use official written policies that are discriminatory or engage in actual practices that are discriminatory. This prohibition includes direct actions by the entity, actions undertaken on behalf of the entity under a contractual relationship, and actions that perpetuate discrimination by another Title II entity.

## Equally Effective Communication

The Town must ensure that communications with people with disabilities are as effective as communications with others. This means, among other things, providing auxiliary aids and services such as qualified interpreters, assistive listening devices, closed and open captioning on videos, telecommunications devices for customers with hearing and speech disabilities, computers that offer voice input and output, and materials in alternative formats such as Braille, large print, diskette and tape.

## ENSURING EQUAL OPPORTUNITY AND NON-DISCRIMINATION IN EMPLOYMENT

In addition to its general non-discrimination requirements for services, and facilities, Title II of the Americans with Disabilities Act (ADA) requires the Town not to discriminate in its employment and personnel practices. A general overview of the regulatory requirements for employment are as follows:

- **Employment activities** are defined to include the application process, testing, interviewing, hiring, job assignment, evaluation, discipline, medical examinations, compensation, promotion, on-the-job training, layoff/recall, termination, leave, and benefits such as health insurance.
- The Town must provide an equal opportunity for an individual with a disability to participate in the **job application process** and to be considered for a job.
- **Interviews** must be conducted in accessible locations, and **requests for reasonable accommodations** such as interpreter services or materials in alternate formats, must be honored unless an undue hardship would result.
- Staff responsible for conducting interviews must be aware of the non-discrimination requirements under Title I, such as **what types of questions are impermissible**, how to provide reasonable accommodations for the job interview process, and the requirement that **medical exams** may not be conducted until after a conditional offer of employment has been made.
- **Employment manuals** should be reviewed to ensure that they are consistent with the ADA, **employment policies and practices** should be examined to ensure that they do not inadvertently discriminate against employees with disabilities, and **policies and practices for providing reasonable accommodations** should be established, if they do not already exist.

## Essential Job Functions

The ability to discern between essential and nonessential job functions, and to provide reasonable accommodations is a critical component of non-discrimination in local government and ensuring that persons with disabilities have equal access to employment opportunities in the Town of Medfield. An **essential job function** is one that the person holding the job must be able to perform with or without **reasonable accommodation**, whereas non-essential job functions are those that do not affect the essence of the job and could be reassigned to other employees.

The ADA establishes a process in determining essential job functions:

- Are other employees in the position actually required to perform the function?
- Would removing that function fundamentally change the job?
- Does the position exist to perform the function?
- What is the number of other employees available to perform the function, or among whom can the function be distributed?
- What is the degree of expertise or skill required to perform the function?

## Reasonable Accommodations

In some cases, an employee may require a reasonable modification when applying for a job, in the work environment, or in employee benefits. A **reasonable accommodation** is assistance or changes to a position or workplace that will enable an employee with a disability to perform their essential job functions. Under the ADA, the Town, as an employer, is required to provide **reasonable accommodations** to qualified employees with disabilities, unless doing so would pose an undue hardship. Examples of reasonable accommodations include making existing facilities accessible; job restructuring; part-time or modified work schedules; acquiring or modifying equipment; changing tests, training materials, or policies; and providing qualified readers or interpreters.

### What types of accommodations are generally considered reasonable?

- Change job tasks
- Provide reserved parking
- Improve accessibility in a work area
- Change the presentation of tests and training materials
- Provide or adjust a product, equipment, or software
- Allow a flexible work schedule
- Provide an aid or a service to increase access
- Reassign to a vacant position

## Effective Communications

The Americans with Disabilities Act (ADA), requires the Town to ensure **effective communication** with individuals with disabilities, and the Town is required to provide appropriate **auxiliary aids and services**, where necessary, to ensure that communications with individuals with disabilities are as effective as communications with others. In addition, telephone emergency services, including 911 services, must provide **direct access** for individuals with speech or hearing impairments. The Town is not required to provide the requested aid or service if there is another equally effective means of communication available; however, it must give primary consideration to the aid or service preferred by the individual. Auxiliary aids that would result in a fundamental alteration in the nature of a service, program, or activity or result in undue financial and administrative burdens are not required. The Town is required to provide information about its ADA-related responsibilities to the public, and to provide notice to individuals with disabilities about the ADA's prohibition against discrimination and their rights under the law, which include access to effective communications.

### Examples of auxiliary aids and services:

- Alternate formats for printed materials (large print, CD, Braille)
- Assistive listening systems
- Sign language interpreters
- Text telephones (TTYs) and relay services
- Accessible websites
- Captioning of audiovisual materials

# GRIEVANCE PROCEDURES

Should the Town fail to meet its non-discrimination obligations, a complaint may be filed in accordance with Medfield's grievance procedures (in the Appendix of this report). For those complaints that are not resolved locally or at the statutory level, the remedy will be found at a Federal Agency.

## FEDERAL AGENCY COMPLAINTS

An administrative complaint may be filed with one of eight designated Federal agencies, or with the Department of Justice, which will refer the complaint to the appropriate agency. An appropriate Federal agency may be any Federal agency that is providing funding to the public entity. It may also be one of the eight Federal agencies designated to investigate complaints as described below:

- **Department of Agriculture** Investigates complaints about government programs, services, or activities related to farming, raising of livestock, extension services, 4-H programs, food stamps, or the U.S. Forest Service.
- **Department of Education** Investigates complaints about government programs, services, or activities related to public elementary and secondary education, higher education, vocational education, or libraries (other than schools of medicine, dentistry, nursing, and other health-related fields.)
- **Department of Health and Human Services** Investigates complaints about government programs, services, or activities related to child care, elder care, preschool, social services, or health care programs including schools of medicine, dentistry, nursing and other health-related fields.
- **Department of Housing and Urban Development** Investigates complaints about government programs, services, or activities related to public housing, housing assistance and referral programs and community development.
- **Department of the Interior** Investigates complaints about government programs, services, or activities related to public lands and natural resources, parks, recreation, water and waste management, environmental protection, energy, historic and cultural preservation, museums, or the U.S. Park Service.
- **Department of Justice** Investigates complaints about programs, services, or activities related to law enforcement or public safety; administration of justice, including courts and correctional institutions; commerce and industry, including general economic development, banking, finance, consumer protection, insurance, and small business; State and local government support services such as audit, personnel, comptroller, administrative services; and all other government functions not assigned to other designated agencies.
- **Department of Labor** Investigates complaints about government programs, services, or activities related to labor and the workforce, including employment services, job training, Job Corps, unemployment insurance, Worker's Compensation, or occupational safety and health.
- **Department of Transportation** Investigates complaints about programs, services, or activities related to highways, traffic management, automobile licensing and inspection, driver licensing, or public transportation systems.

The Disability Rights Section of the Civil Rights Division of the U.S. Department of Justice is responsible for reviewing disability related complaints. Complaints should be submitted in writing, signed by the complainant or an authorized representative, and should contain the complainant's name and address, identify the public agency or agent involved in committing the offense, and describe nature of the offense experienced by the complainant. Additional information can be found at: <https://www.justice.gov/crt/disability-rights-section-responsibilities>

In addition, the Massachusetts Commission on Disability (MCOD) can be helpful with enforcement of both the State's 521 CMR (Architectural Access Board) and the provisions of the Americans with Disabilities Act. When MCOD receives a complaint, the agency investigates and provides resources for remediation, as appropriate. Additional information regarding the Massachusetts Office on Disability can be found online at: <https://www.mass.gov/orgs/massachusetts-office-on-disability>

# SECTION 3: SELF-EVALUATION



## PROGRAM AREAS

- ADA Coordinator and Commission on Disabilities
- Public Notice & Grievance Procedures
- Services & Operations
- Emergency Procedures
- Town Website
- Voting



## EMPLOYMENT POLICIES

- Job Descriptions
- Eligibility Criteria
- Essential Job Functions
- Reasonable Modifications



## Effective Communications

- Auxiliary Aids & Services
- Person-First Language
- Appropriate Behavior

## SELF-EVALUATION PROCESS

The Town retained the services of Community Opportunities Group, Inc. (COG), in a joint venture with Kessler McGuinness & Associates, LLC (KMA) to perform an assessment of Medfield's programs, services and facilities and develop a Self-Evaluation and Transition Plan (SETP). To develop the SETP, COG and KMA have performed the following tasks:

1. COG and KMA performed a kick-off meeting and ADA staff training.
2. Three questionnaires were distributed: one addressing the central Town Administration policies and procedures, one addressing the employment practices of the Town, and a generalized third questionnaire for each Town Department. The questionnaires were administered online and provided training to staff on Town policies and procedures.
3. The Town's policies and procedures were audited and reviewed.
4. KMA undertook architectural access audits of Town buildings and facilities where programs or services are provided to the public, and submitted an ADA Existing Conditions Report.
5. COG and KMA developed and submitted an ADA Self-Evaluation and Transition Report.
6. Following internal review and prioritization, a list of priorities for barrier removal via physical remediation or policy changes was developed and a report was drafted.
7. The report was then submitted for public comment and reviewed and adopted by the Board of Selectmen in January 2021.

The self-evaluation identifies and corrects those policies and practices that are inconsistent with Title II's requirements. Self-evaluations should consider all of a municipality's programs, activities, and services, as well as the policies and practices that it has put in place to implement its various programs and services.

**Measures to bring programs, policies, and services into compliance with Title II may include:**

1. Relocation of programs to accessible facilities;
2. Offering programs in an alternative accessible manner;
3. Structural changes to provide program access;
4. Policy modifications to ensure nondiscrimination; and
5. Auxiliary aids needed to provide effective communication.



# GENERAL NON-DISCRIMINATION REQUIREMENTS

## ADA Coordinator

One critical administrative requirement in the ADA is for public entities with more than fifty employees to appoint an ADA Coordinator. Having an ADA Coordinator benefits the town by providing a specific contact person with knowledge and information about the ADA so that questions by staff and members of the public can be answered efficiently and consistently. In addition, the person in the position coordinates compliance measures and can be instrumental in ensuring future compliance.

Qualifications that help an ADA Coordinator to be effective include:

- familiarity with the state or local government's structure, activities, and employees
- knowledge of the ADA and other laws addressing the rights of people with disabilities, such as Section 504 of the Rehabilitation Act, 29 U.S.C. § 794
- experience with people with a broad range of disabilities
- knowledge of various alternative formats and alternative technologies that enable people with disabilities to communicate, participate, and perform tasks
- ability to work cooperatively with the local government and people with disabilities
- familiarity with any local disability advocacy groups or other disability groups
- skills and training in negotiation and mediation
- organizational and analytical skills

The Town of Medfield's ADA Coordinator is:

**Kristine Trierweiler**, Medfield Town Administrator

**EVALUATION:** The website should contain links to the Town's ADA Procedures, relevant forms and reports, a method to submit comments, complaints, and/or requests, and provide information and resources on accessibility matters. The ADA coordinator should receive training on their responsibilities.

## Commission on Disabilities

The Town of Medfield does not currently have a Commission on Disabilities. Creating a commission requires finding a sponsor to propose adopting a commission pursuant to MGL Ch. 40 Section 8J at Town Meeting, followed by an affirmative vote to adopt. The Massachusetts Office on Disabilities offers sample enabling and operating bylaws, information on best practices, and materials related to the benefit of adopting a disabilities commission.

The function of a Disabilities Commission is to:

1. Research local problems of people with disabilities;
2. Advise and assist municipal officials and employees in ensuring compliance with state and federal laws and regulations that affect people with disabilities;
3. Coordinate or carry out programs designed to meet the problems of people with disabilities in coordination with programs of the Massachusetts Office on Disability;
4. Review and make recommendations about policies, procedures, services, activities and facilities of departments, boards and agencies of said city or town as they affect people with disabilities;
5. Provide information, referrals, guidance and technical assistance to individuals, public agencies, businesses and organizations in all matters pertaining to disability; and
6. Coordinate activities of other local groups organized for similar purposes.

Pursuant to MGL Ch. 40 Section 8J, there are several statutory requirements for the composition of a disabilities commission. A commission requires the appointment of at least five members, and no more than thirteen members by

the Board of Selectmen. There are several requirements for commission composition: the majority of commission members must be persons with disabilities; one commissioner may be an immediate family member of a person with a disability; and one member must be an elected or appointed municipal official. For more information regarding the adoption of a disabilities commission, please visit: <https://www.mass.gov/how-to/establish-a-commission-on-disability-in-your-city-or-town>

**EVALUATION:** The Board of Selectmen have formed an ADA Compliance Review Committee.

# Public Notice

All public entities must provide information to the public, program participants, program beneficiaries, applicants and employees about the ADA and how it applies to the public entity. The Town of Medfield does not consistently provide public notice regarding the ADA and the Town's Grievance Procedures across all Town departments, boards, facilities, services, and programs.

Methods to Provide Public Notice Include:

- Put the notice in the Town's buildings and facilities, website, and social media.
- Include the notice in job applications and in employee handbooks.
- Publish the notice in hearing and meeting notices and on the Town's Calendar
- Broadcast the notice in public service announcements on local radio and television stations.
- Include the notice in program announcements and applications.

The information must be provided in “alternative” formats on an ongoing basis so that it is accessible to people with hearing and vision disabilities. Alternative format may include: captioned public service announcements on television, large print formats (with a sans-serif typeface in at least 18 pt. size font), braille, text file, HTML format on the Town’s website, and/or audio or video recording and should generally be provided in the format requested by the person or persons with a disability.

## Americans with Disabilities Act Sample Notice Language (Long & Short Form)

### Long Form:

The (Name of Public Entity) does not discriminate on the basis of disability in its services, programs, or activities.

**Employment:** (Name of public entity) does not discriminate on the basis of disability in its hiring or employment practices and complies with the ADA Title I employment regulations.

**Effective Communication:** (Name of public entity) will, upon request, provide auxiliary aids and services leading to effective communication for people with disabilities, including qualified sign language interpreters, assistive listening devices, documents in Braille, and other ways of making communications accessible to people who have speech, hearing, or vision impairments.

**Modifications to Policies and Procedures:** (Name of public entity) will make reasonable modifications to policies and procedures to ensure that people with disabilities have an equal opportunity to enjoy programs, services, and activities. For example, people with service animals are welcomed in (name of public

### Short Form:

The (Name of Public Entity) does not discriminate on the basis of disability in its programs, services, activities and employment practices.

If you need auxiliary aids and services for effective communication (such as a sign language interpreter, an assistive listening device or print material in digital format) or a reasonable modification in programs, services or activities contact the ADA Coordinator as soon as possible, preferably XX days before the activity or event.

A grievance procedure is available to resolve complaints.

This notice is available in alternative formats by request.  
[ADA Coordinator name and contact information]





entity) offices, even where pets and other animals are prohibited.

**Requests:** To request an auxiliary aid or service for effective communication, or a modification of policies or procedures contact [ADA Coordinator name and contact information] as soon as possible, preferably XX days before the activity or event.

**Complaints:** Send complaints to [ADA Coordinator name and contact information].

**EVALUATION:** Within the Town House and other town buildings, there are “Equal Opportunity It’s the Law” information posted on multiple bulletin boards pertaining to employment of individuals with disabilities pertaining to Titles I & V of the ADA and Sections 503 & 504 of the Rehabilitation Act of 1973 for programs or activities receiving Federal Financial Assistance. In addition, there are two other posters labeled “Discrimination Is Against the Law” and a “Nondiscrimination Statement” regarding employment on these same bulletin boards. Apart from these standard postings and language, the Town does not have formal policies and procedures pertaining to the ADA and program accessibility, grievances, communications, equal opportunity and non-discrimination except when it comes to employment opportunities, where it speaks to the Town being an affirmative action/equal opportunity employer. There should be consistency in all departmental policies, procedures, and practices including the posting of employment ads, actual job descriptions, and reasonable accommodations to potential and existing employees.

## Grievance Policy

Public entities with 50 or more employees must have a grievance procedure to address discrimination complaints in general, and those related to disability more specifically. A grievance procedure provides people who believe they have been discriminated against because of their disability, or others who believe they have been discriminated against because they have a friend or family member with a disability, with a formal process to make their complaint known. This procedure encourages prompt and equitable resolution of the problem at the local or state level without forcing people to file a federal complaint or a lawsuit. Title II regulations do not specify the procedures for the grievance procedure and a public entity may use a grievance procedure that is already in place.

### A Grievance Policy Should Address the Following:

- A description of the procedures for submitting a grievance.
- The steps that will be taken by the public entity.
- Reasonable, specific time frames for review and resolution of the grievance.
- A two-step review process that allows for appeal.
- Record-keeping for complaints submitted and documentation of steps taken towards resolution.

Below is a sample Grievance Procure provided by the United States Department of Justice, as modified for New England:

### Grievance Procedure under The Americans with Disabilities Act

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA"). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the [name of public entity]. The [Public Entity]'s Personnel Policy governs employment-related complaints of disability discrimination.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint, will be made available for persons with disabilities upon request.

The complaint should be submitted by the grievant and/or his/her designee as soon as possible but no later than 60 calendar days after the alleged violation to:

[Insert ADA Coordinator's name]  
ADA Coordinator [and other title if appropriate]  
[Insert ADA Coordinator's mailing address]

Within 15 calendar days after receipt of the complaint, [ADA Coordinator's name] or [their] designee will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, [ADA Coordinator's name] or [their] designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the [name of public entity] and offer options for substantive resolution of the complaint.

If the response by [ADA Coordinator's name] or [his/her] designee does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within 15 calendar days after receipt of the response to the [Board of Selectmen] or [their] designee.

Within 15 calendar days after receipt of the appeal, the [Board of Selectmen] or [their] designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the [Board of Selectmen] or [their] designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by [name of ADA Coordinator] or [their] designee, appeals to the [Board of Selectmen] or [their] designee, and responses from these two offices will be retained by the [public entity] for at least three years.



**EVALUATION:** The Town of Medfield's Personnel Plan address grievances related to sexual harassment for employees, but for no other form of discrimination. There are no grievance procedures established for the general public. The Town should adopt a Grievance Policy similar to the sample policy provided by the United States Department of Justice above, to address disability specific related complaints. The policy should be posted to the Town's website where the ADA Coordinator's information is located and should be reflected in the Town's Personnel Plan, which should also be posted online and in conspicuous locations.

## TOWN SERVICES AND OPERATIONS

The following is a representative list of municipal programs and services provided by the Town of Medfield by a combination of staff and volunteer boards and committees along with the primary location where their respective operations are conducted, and key findings from the Self-Evaluation Questionnaires submitted by staff and board members:

DEPARTMENT & BOARDS	KEY SERVICES AND FUNCTIONS	PRIMARY LOCATION
<b>TOWN ADMINISTRATOR &amp; BOARD OF SELECTMAN</b> <i>Capital Budget Committee</i> <i>Warrant Committee</i> <i>State House Dev. Committee</i> <i>Planning &amp; Building Committee</i> <i>Bay Colony Rail Trail Committee</i> <i>Dale Street School Committee</i> <i>Medfield State Hospital Committee</i>	Appointed by the Board of Selectman, the Town Administrator has supervisory responsibilities for hiring and firing certain personnel, maintains an inventory of town-owned property and a purchasing system, makes recommendations to improve town services, and conducts studies and investigations pertaining town government. The Town Administrator also serves as the ADA Coordinator.	Town House  <i>Public Safety Bldg.</i> <i>DPW Bldg.</i>
<b>EVALUATION:</b> The Town Administrator's Office largely lacks formal procedures and policies to provide public notice regarding the Town's ADA responsibilities, address requests for reasonable accommodations during the hiring and employment processes, provide assistive equipment, or training to staff and boards.		
<b>TOWN ASSESSOR</b> <i>Board of Assessors</i>	The Assessor's primary responsibility is to find the "full and fair cash value" of local real property. The tax rate is calculated by the assessors using information collected from town meeting votes, various town officials, and state agencies. Each property is to be assessed on a five-year basis to determine its taxable value. The Assessor's Department is staff by a principal and field assessor and an administrative assistant, all of whom assist the Board of Assessors.	Town House
<b>EVALUATION:</b> The Assessor's Department is open to the general public and occasionally deals directly with disability-related property tax exemptions. Staff have not received training related to the Town's ADA policies, lacks awareness as to how to obtain assistive equipment or materials in alternative formats, and does not provide public notice of the Town's ADA obligations on their website, print materials, meeting notices, or tax bills.		
<b>Board of Health</b> <i>Lyme Disease Study Committee</i>	The Board of Health, under the jurisdiction of the Massachusetts Department of Public Health, ensures that all state regulations pertaining to public health are enforced. The Board of Health has six members, and is served by an administrative agent employed by the Town. The Board of Health employs a Professional Engineer/Agent to review all plans concerning stormwater runoff, drainage, and septic system design as they pertain to subdivisions, commercial property, and private homes, and also to review food handling permits.	Town House

DEPARTMENT & BOARDS	KEY SERVICES AND FUNCTIONS	PRIMARY LOCATION
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**EVALUATION:** The Board of Health did not complete a Self-Evaluation Questionnaire. This evaluation is based on a review of their department website, which currently only offers materials as links to PDF documents. Documents in PDF or other image-based formats are often not accessible to people who are blind or have low vision and use screen readers, text enlargement programs, or different color and font settings to read computer displays. The solution would be to always provide documents in an alternative text-based format, such as HTML or RTF (Rich Text Format), in addition to PDF. Text-based formats are the most compatible with assistive technologies.

Building Department	The Building Department consists of a Building Commissioner, Local Inspector and Inspectors of Wiring, Plumbing, and Gas. The Department reviews and issues permits for all new construction and renovation projects. Inspections are conducted throughout the construction/renovation process. The Building Commissioner is responsible for enforcement of the Medfield Zoning Bylaw.	Town House
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**EVALUATION:** The Building Department is generally aware of their responsibilities with respect to administration of the ADA, as well as its application to the State's Building and Accessibility Codes. Their notices do not contain language related to methods of requesting auxiliary aids or alternative formats, but do contain language regarding non-discrimination. In addition, the Building Department reported their awareness of several physical barriers in the Town House.

Council on Aging	The Council on Aging (COA) provides advocacy, support services, and programs to help Medfield seniors live full lives. The COA's primary responsibilities are to design, promote, and implement services to address the identified needs of the community's elder population, and to coordinate existing services in the community. The COA also provides vital senior services such as transportation for medical appointments, health and legal service clinics, social and civic activities, exercise and educational classes, access to SHINE counselors, and other services. The COA works in concert with public and private agencies and providers in the area, and with the Massachusetts Executive Office of Elder Affairs.	The Center <i>Three Vehicles</i>
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**EVALUATION:** The COA provides extensive services, programs, and facilities serving Medfield's senior and disabled populations. The COA is well adapted to serving individuals of all abilities and has received trainings on appropriate and effective communications. However, staff has not received training specifically related to the Town's ADA policies, and in particular, on grievance procedures should a complaint arise. In addition, the COA does not always provide public notice for formal requests for accommodations, but in practice makes such accommodations as requested by the individual. Finally, the COA operates three vehicles to serve the transportation needs of Medfield Seniors. Two of the vehicles have lifts and are fully accessible and should be used for any needs serving disabled seniors.

DEPARTMENT & BOARDS	KEY SERVICES AND FUNCTIONS	PRIMARY LOCATION
Emergency Management Agency	Emergency Management is responsible for the development of the Town's emergency management plans in the event of a disaster or crisis, and the implementation of such plans and procedures should a disaster occur. Emergency Management plans address notification; evacuation; sheltering; access to refrigeration, medication, and backup power; access to information; and return procedures following evacuation in a variety of disaster scenarios. The Emergency Management Agencies are responsible for operating the Civic Ready emergency notification system. With Civic Ready, state and local agencies can deliver geo-targeted, time-sensitive information to individuals who have registered to receive alerts. Notifications can be sent via email, SMS, voice, mobile app push notifications, IPAWS, and other formats depending on the severity of the situation.	Town House

**EVALUATION:** Medfield's Emergency Management Agency did not participate in the Questionnaire and their website is blank. The Town does participate in the Civic Ready program which allows for the communication of emergency notifications in alternative formats. Emergency Management Plans must account for the needs of disabled residents – which is of critical importance during evacuations (particularly with respect to transportation), power outages, sheltering, and access to medical care. The Town must ensure that management plans include these provisions, that the provisions are included as part of routine training for first responders, and that they are broadly communicated to the public. Including this information on the Emergency Management Agency's webpage in accessible formats is critically important.

Fire Department	The Fire Department protects the Town from the loss of life and property from fire, and to responds in a quick and efficient manner to medical emergencies. In addition to fire suppression duties, the Fire Department responds to medical emergencies, hazardous material incidents, water problems, and other calls for assistance. The department also provides safety education, code enforcement, plan review and inspections.	Public Safety Bldg.
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**EVALUATION:** Due to the physical nature of the work performed by Emergency Services Personnel, employment for these positions within the Fire Department is contingent upon a medical examination. Injury on the job is possible, and discussion of the rights of employees and clear procedures for the request of reasonable accommodations – temporary or otherwise – should be part of routine staff training. In addition, the Fire Department also employs non-emergency personnel whose job descriptions and training requirements may differ from other department personnel.

DEPARTMENT & BOARDS	KEY SERVICES AND FUNCTIONS	PRIMARY LOCATION
<b>Human Resources</b> <i>Employee Insurance Advisory Committee</i> <i>OPEB Trust Committee</i> <i>Personnel Board</i>	HR is responsible for managing the employee life cycle (i.e., recruiting, hiring, onboarding, training, and firing of Town employees) and administering Town employee benefits.	Town House
<p><b>EVALUATION:</b> The Town’s HR practices are generally in line with the Title II Requirements of the ADA. Employment applications contain the following equal opportunity statement: <i>“The Town of Medfield is an Equal Opportunity Employer. Town of Medfield considers applicants for all positions without discrimination on the basis of race, color, religion, sex, marital status, national origin, age, physical or mental disability, sexual orientation, ancestry, veteran status or any other class protected by federal, state, or local law. No question on this application is used for the purpose of limiting or excluding any applicant’s consideration for employment on any basis prohibited by local, state or federal law.”</i></p> <p>The applications do not provide instructions for assistance with filling out the application.</p> <p>Not all job descriptions are reviewed and updated by the Personnel Board. Overall, most of the submitted job descriptions were consistent; using clear, concise, and non-technical language. All job descriptions contain Essential Duties &amp; Responsibilities, Desired Minimum Qualifications such as Knowledge, Skills &amp; Abilities, Supervision Exercised, Licensing &amp; Certification, Physical Demands and Work Environment. In defining essential functions and/or physical requirements, the description should focus on the outcome and not the process to achieve that outcome. Language describing physical or sensory requirements should be as specific as possible when describing the tasks required. For example, if heavy lifting is required, what is being lifted, how high it is being lifted, and what it is being lifted onto should also be described.</p> <p>The Town’s Personnel Manual lacks language pertaining to Title II of the ADA notifying employees of their rights. While there is contact information for the EEOC, there is no EEOC statement. In addition, there is no information regarding the availability of reasonable accommodations or clear procedures established for the request, or granting of reasonable accommodations either during the hiring or employment process. Further, there are no grievance procedures in place to address disability related complaints. The Employee Manual should be updated to include notification regarding the ADA and identification of the Town’s ADA Coordinator. Procedures to address accommodations and grievances should be included, and the inclusion of these provisions should be communicated to staff and contractors.</p>		
<b>Parks &amp; Recreation</b>	The Parks and Recreation Department oversees the Town’s resources and services provided for the purposes of leisure, entertainment, and recreation. Resources include public spaces and facilities like parks, playing fields, the Pfaff Center, and other areas. Services include recreational activity programs such as athletic leagues, special events, arts programs, and environmental education programs.	Pfaff Center  <i>Metacomet Park</i> <i>McCarthy Park</i> <i>Hinkley Park</i> <i>Hinkley Pond</i> <i>Transit Van</i>

DEPARTMENT & BOARDS	KEY SERVICES AND FUNCTIONS	PRIMARY LOCATION
<p><b>EVALUATION:</b> Parks and Recreation provides extensive programming and seasonal employment to local youth (and adults, depending on the position). Presently the department does not provide any alternative programs for youth with specific disabilities, however, all programs are open to participants of any ability provided they are of the appropriate age. But due to physical barriers in many of the facilities where programming occurs (such as the Pfaff Center and local parks), some programs may not be accessible. In addition, although Parks and Recreation provides transportation and operates a van, the van does not have a lift and the department does not have a way to transport participants with mobility-related challenges. As the Town grapples with park and field upgrades, new school buildings, and the future home of recreation programming, ADA considerations should be strongly factored as Parks and Recreation is not currently meeting Title II obligations despite their best efforts because of issues with their facilities.</p>		
<b>Planning &amp; Zoning</b> <i>Board of Appeals</i> <i>Planning Board</i> <i>Conservation Commission</i> <i>Master Plan Committee</i> <i>Affordable Housing Trust</i>	The Planning and Zoning Department is responsible for the administration of the Planning Board, Zoning Board of Appeals, and Conservation Commission, for the review of development proposals, zoning amendments, special projects, and other planning objectives.	Town House <i>Public Safety Bldg.</i> <i>DPW Bldg.</i> <i>High School</i>
<p><b>EVALUATION:</b> Planning &amp; Zoning is largely in compliance with Title II obligations, but needs to provide public notice regarding accommodations on agendas and hearing notices. In addition, due the occasional site visit conducted by land use boards in the field, which tend to be inherently physically inaccessible, policy needs to be developed (such as filming site visits and making the videos available after the fact) to ensure that site visits are accessible when accommodations are requested. Finally, Planning &amp; Zoning should ensure that reports and documents submitted to the department for posting to the Town's website are in accessible formats (such as HTML) that are readable to adaptive equipment.</p>		
<b>Police Department</b>	The primary purpose of the Police Department is to uphold the laws of the jurisdiction, provide patrol, and investigate local crimes. In addition, the department provides safety education, reviews firearm license applications, and community training.	Public Safety Building
<p><b>EVALUATION:</b> The Police Department responded in part to the Self-Evaluation Questionnaire, and it is unclear if the local police and support staff have received training on interacting with individuals with disabilities or on their rights under the ADA in employment. Due to increased probability for law enforcement officers to be injured on the job, particularly in motor vehicle accidents or during physical altercations when intervening or apprehending individuals, it is critical that officers and their employers are aware of the Town's responsibilities in providing reasonable accommodations, such as temporary office work in lieu of patrol work, or other such accommodations in the event of injury or other temporary or permanent disability. In addition, the police also need to provide public notice of accommodation for any trainings or events offered to the public in addition to staff.</p>		



DEPARTMENT & BOARDS	KEY SERVICES AND FUNCTIONS	PRIMARY LOCATION
<b>Public Library</b> <i>Board of Trustees</i>	The library serves the general public's information needs. The library promotes literacy and STEM educational programming, quiet study and work areas for students and professionals, or social activities such as book clubs, etc. The library allows users to borrow books and other materials; they also have non-circulating reference collections, and provide computer and Internet access to patrons.	Medfield Public Library
<b>EVALUATION:</b> The library offers extensive programming – there is a children’s programming room, a teen makerspace, a meeting room for adult programs, a conference room, and the Dailey Room where lectures are given – and has extensive equipment and facilities serving persons of all abilities. Collections are available in alternative formats, and staff has received training on how to handle their request. Much of the library’s communications are handled digitally. Communications should be modified to include public notice with respect to the Town’s Title II obligations.		
<b>Public Works</b> <i>Transfer Station and Recycling Committee</i> <i>Water &amp; Sewer Board</i> <i>TSARC</i>	Public Works is responsible for the following Divisions: Highway, Water and Sewerage, the Transfer Station, Cemetery, Equipment Maintenance and Repair, and Snow and Ice.	Public Works Bldg. <i>Town House</i>
<b>EVALUATION:</b> The Department of Public Works provides many of its notifications to the public via sandwich board signs, paper mailings, and hand delivered flyers. While these methods are extremely effective at providing important information to the public, the formats are inaccessible to those with vision impairments. DPW should ensure that any messages that are distributed via paper or sign should also be posted on their social media, the Town’s website, and Civic Ready (when applicable) to ensure that messages are equally communicated. In addition, DPW should provide notice to staff and the public regarding the Town’s Title II obligations, particularly with respect to reasonable accommodations, as some DPW positions entail physical labor and employees could get injured and require accommodation. Finally, as the transfer station is not inherently accessible, DPW should ensure that the transfer station has staff that can assist residents should they require accommodations.		
<b>Town Accountant, Tax Collector, and Treasurer</b>	The Town Accountant receives, approves, or disapproves departmental requests for payment of goods, services and payroll chargeable to respective appropriations and other accounts. The offices of the Treasurer and Tax Collector are served under a combined position; the Treasurer is responsible for collecting accounts receivable to the Town, processing payroll, borrowing, and otherwise managing the Town’s finances.	Town House
<b>EVALUATION:</b> The Town’s finances are overseen by the Town Accountant and the Tax Collector/Treasurer who provide support to the public on an as-needed basis while also performing administrative tasks central to the financial operation of the Town. On their Self-Evaluation Questionnaires, both respondents reflected that they had not received ADA training, were not providing materials in alternative formats, and were not providing public notice, similar to other Town Departments.		



DEPARTMENT & BOARDS	KEY SERVICES AND FUNCTIONS	PRIMARY LOCATION
<b>Town Clerk</b>	The Office of the Town Clerk, operated by the Town Clerk who is elected to a three-year term by the citizens of Medfield, is responsible for the maintenance of factual public records, the administration of fair and accurate elections, and the registration of Town voters.	Town House <i>Medfield High School</i>
<b>EVALUATION:</b> Ensuring that voting facilities are accessible for both Town Meeting and general elections is among the most critical accessibility requirements the Town must meet in order to provide basic access to democracy. Voting machines, polling areas, and Town Meeting must all be accessible. To this end, the Town is meeting its obligations. As the keeper of records, the Town Clerk is also responsible for administering and filing forms (ranging from dog licenses to vital records), and must provide assistance to those requiring it for such forms. While most forms are available online, they are largely offered in PDF format, which is less desirable for those using assistive technology. In addition to general public notice requirements, ensuring that forms are available in alternative formats and providing notice of their availability in said formats will need to be improved.		
<b>Veterans Services Office</b>	The Veterans Services Officer (VSO) is a part time employee of the Town of Medfield that supports local veterans and their families.	Town House
<b>EVALUATION:</b> The Veteran Service Office works in connection with the Massachusetts Office on Disability in addition to other agencies (primarily federal). The VSO page on the Town's website provides links back to MOD. Like most other departments, forms are offered in PDF format, which can present challenges for those with vision impairments. The Veterans Services Officer did not respond to the Self-Evaluation Questionnaire, and it is unclear how communications are generally provided or if they contain public notice regarding the ADA. In addition, it is not clear if all services are provided in an accessible location, but presumably most appointments occur within their office at the Town House.		

## Website Accessibility

Section 508 of the Rehabilitation Act, as amended by the Workforce Investment Act of 1998, requires federal agencies to develop, procure, maintain and use information and communications technology (ICT) that is accessible to people with disabilities - regardless of whether or not they work for the federal government. The US Access Board established the Section 508 standards that implement the law and provides the requirements for accessibility.

Section 508 requires federal agencies to make their ICT such as technology, online training and websites accessible for everyone. This means that federal employees with disabilities are able to do their work on the accessible computers, phones and equipment in their offices, take online training or access the agency's internal website to locate needed information. Section 508 also means that a person with a disability applying for a job with the federal government or a person who is using an agency's website to get information about a program, or completing an online form has access to the same information and resources available to anyone.

Information and Communications Technology (ICT) is any equipment or system that is used to create, convert, duplicate or access information and data.

## Examples of ICT include, but are not limited to:

- Telephones, smart phones and mobile devices
- Televisions, DVD players and videotaped productions
- Internet and Intranet websites
- PDF documents
- Content on DVDs and CDs
- Online training, webinars and teleconferencing
- Technical support call centers
- Remote access websites and tools
- Tablet, laptop and desktop computers
- Software and operating systems
- User guides for software and tools
- Copiers, printers and fax machines

**EVALUATION:** The Town uses CivicPlus, a software platform built for local government, to maintain the Town's website. CivicPlus designs the website to comply with Section 508 and in accordance Web Content Accessibility Guidelines (WCAG) 2.0A and 2.0AA. It also features an online help center in the event that the Town has problems with its website, including accessibility requirements. CivicPlus uses AudioEye as its ADA web accessibility provider in order to determine compliance with the Success Criteria of the WCAG 2.0 and ADA related requirements.

### **The Town's website contains the following notification regarding accessibility:**

*If you use assistive technology (such as a Braille reader, a screen reader, or TTY) and the format of any material on this website interferes with your ability to access information, please contact us. To enable us to respond in a manner most helpful to you, please indicate the nature of your accessibility problem, the preferred format in which to receive the material, the web address of the requested material, and your contact information. Users who need accessibility assistance can also contact us by phone through the Federal Information Relay Service at 1-800-877-8339 for TTY/Voice communication.*

**In most cases, font sizes and color contrasts appear to be acceptable. Documents (i.e., minutes, reports and policies) that were reviewed had a zoom magnifier allowing visually impaired users to change font size and enhance the image. However, most of the photos were not accompanied by descriptive or identifying text.**

**Best practices to ensure that the Town's website maintains its accessibility for people with various levels of visual impairments include:**

- 1. Establish, implement, and post online a policy that web pages will be accessible and create a process for implementation.**

## **2. Ensure that all new and modified web pages and content are accessible:**

- Check the HTML of all web pages. Make sure that accessible coding is used.
- Make sure that the website is designed so it can be displayed using the color and font settings of each visitor's browser and operating system.
- If images are used, (including photos, graphics, scanned images, or image maps) make sure to include a text equivalent, by adding "alt" tags or long descriptions, for each.
- When online forms and tables are used, make those elements accessible by labeling each control (including buttons, check boxes, drop-down menus, and text fields) with a descriptive HTML tag.
- When posting documents on the website, always provide them in HTML or a text-based format (even if you are also providing them in another format, such as PDF).



# SECTION 4: ARCHITECTURAL AUDITS

As part of the SETP Process, Kessler McGuinness & Associates (KMA), architecture and accessibility experts audited the following buildings and facilities:

BUILDINGS	
Department of Public Works	Public Safety Building
Dwight-Derby House	Senior Center
Medfield High School	Town Hall
Pfaff Recreation Center	Transfer Station, Salt Shed, and Swap Shack
Public Library	
EXTERIOR AREAS	
Baxter Memorial Park	Onandaga Lane
Hinkley Park & Pond	Kingsbury Pond
Metacomet Park	Red Gate Pond
McCarthy Park	Entrance to Holmquist
Noon Hill Reservation	Medfield Community Gardens




## BUILDINGS


### DEPARTMENT OF PUBLIC WORKS

*AUDITED ON: JUNE 9, 2020*



The Department of Public Works is located at 55 North Meadows Road. The site includes a one-story department building and the town garage. Parking is provided, including two designated accessible parking spaces. The building includes various offices, conference rooms, an employee break room, a training room, and a single-user toilet room. The conference rooms in the building are used by various town departments, boards, and committees to hold meetings, which are generally attended by Town staff and members of the public, often outside of regular business hours.

#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	<p><b>Parking</b></p> <p>The accessible parking spaces lack the required signage.</p> <p>For a parking lot with two accessible spaces, one must be van accessible. The existing designated accessible parking spaces do not meet the dimensional requirements for a van accessible space.</p>		<p>Install the signs at 60" min. AFF, measured to the bottom of the sign, including a van accessible sign. Unit Cost: \$100 ea. Quantity: 2</p> <p>Restripe the pavement markings in the parking spaces and associated access aisle. Unit Cost: \$150 per space or aisle Quantity: 3</p>	\$650
2.	<p><b>Employee Break Room</b></p> <p>The pedestal tables do not provide the required knee and toe clearance.</p> <p>The hood controls are mounted &gt;48" AFF, @ 64" AFF.</p> <p>The oven controls are mounted &gt;48" AFF, @ 59" AFF.</p> <p>The bottom hinged oven lacks an adjacent 30" wide minimum counter work surface.</p>	 	<p>Provide at least one table, and no less than 5% of the total number of tables, that provides compliant knee and toe clearance. Unit Cost: \$250 ea. Est. Quantity: 1</p> <p>Install hood controls within an accessible reach range. Unit Cost: \$1,000 ea. Quantity: 1</p> <p>Lower the oven. Unit Cost: \$1,000 ea. Quantity: 1</p> <p>Provide an adjacent 30" wide minimum counter work surface at the wall oven. Unit Cost: \$3,000 ea. Quantity: 1</p>	\$5,250

#	Barrier Statement	Photo	Proposed Mitigation	Cost
3.	<p><b>Single-User Toilet Room</b></p> <p>The sink is &gt;34" AFF, @ 36" AFF.</p> <p>The mirror is &gt;40" AFF, @ 41" AFF, measured to the bottom of the reflective surface.</p> <p>The door requires &gt;5lbs of force to open.</p>		<p>Lower the sink to 34" AFF max. Unit Cost: \$3,000 ea. Quantity: 1</p> <p>Lower the mirror. Unit Cost: \$50 ea. Quantity: 1</p> <p>Adjust the door closers. Unit Cost: \$50 Quantity: 1</p>	\$3,100
TOTAL FOR DEPARTMENT OF PUBLIC WORKS:				\$9,000







## DWIGHT-DERBY HOUSE

AUDITED ON: AUGUST 20, 2020



The Dwight-Derby House, originally constructed in 1697, with an addition constructed in 1713, is an historic property listed on the National Register of Historic Places. Located at 7 Frairy Street, the house is owned by the Town of Medfield and operated as a museum by the Friends of the Dwight Derby House. The property lacks accessible parking spaces, and there are no accessible routes into the buildings. In order to provide better access, tours should be video filmed and recorded, thereby accommodating visitors with mobility challenges.



#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	<p><b>Exterior Accessible Route</b></p> <p>The accessible route to the building entrance has a paved area &gt;5%, @ up to 11.3%.</p> <p>The building has four entrances, one of which is accessible. Therefore, it has &lt;60% of its entrances accessible, due to non-accessible routes leading to them and/or steps up.</p>		<p>Pave and regrade the route to the entrance. Unit Cost: \$25/SF Est. Quantity: 50</p> <p>Make two additional entrances accessible by providing a ramp. Unit Cost: \$10,000 Est. Quantity: 2</p>	\$21,250
2.	<p><b>Interior Accessible Route</b></p> <p>The thresholds into the building and throughout the building are &gt;0.5" and not beveled, @ up to 1.25".</p>	 	<p>Replace the threshold. Unit Cost: \$250 ea. Est. Quantity: 4</p>	\$1,000
3.	<p><b>Toilet Room</b></p> <p>The mirror is &gt;40" AFF, @ 45" AFF, measured to the bottom of the reflective surface.</p> <p>The coat hook is mounted &gt;48" AFF.</p>		<p>Lower the mirror. Unit Cost: \$50 Quantity: 1</p> <p>Install a coat hook mounted no higher than 48" AFF. Unit Cost: \$50 Quantity: 1</p>	\$100





#	Barrier Statement	Photo	Proposed Mitigation	Cost
4.	<b>Kitchen</b> The sink is >34" AFF, @ 37".		Lower the sink counter to 34" AFF max. Unit Cost: \$3,000 ea. Quantity: 1	\$3,000
TOTAL FOR DWIGHT-DERBY HOUSE: \$25,350				



## MEDFIELD HIGH SCHOOL

AUDITED ON: JUNE 9, 2020







**Medfield High School is located at 88 South Street. Town Meetings are held within the main lobby, library, cafeteria, and gymnasium. Members of the public use the toilet rooms near the library and inside of the cafeteria. There is surface parking at the front of the building which includes five designated accessible parking spaces serving the main entrance.**

#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	<b>Parking</b> The width of the designated van accessible access aisle is <96", @ 60".		Restripe the pavement markings in the parking spaces and associated access aisle. Unit Cost: \$150 per space or aisle Quantity: 3	\$450
2.	<b>Cafeteria Lift</b> The lift door lacks a level landing, @ 9.3%.		Provide a level landing at the lift door. Unit Cost: \$500 ea. Quantity: 1	\$500
3.	<b>Men's &amp; Women's Toilet Rooms (Cafeteria)</b> The paper towel dispenser protrudes >4" into the circulation space, @ 10". The paper towel dispenser controls are mounted >48" AFF, @ 54" AFF. The stall lacks a door pull on both sides of the door near the latch. The toilet paper dispenser is mounted <12" above the side grab bar, @ 6". The toilet centerline is not 16"-18" from the side wall, @ 19". The side grab bar extends <54" from the rear wall, @ 48" (men's only). The sink is located within an alcove >24" deep and lacks the required 36" minimum clear width, @ 31" wide (women's only).	 	Install a cane detectable object below the paper towel dispenser. Unit Cost: \$250 ea. Quantity: 2 Relocate the paper towel dispenser. Unit Cost: \$50 ea. Quantity: 2 Install a door pull on both sides of the stall door near the latch. Unit Cost: \$50 ea. Quantity: 4 Relocate the toilet paper dispensers. Unit Cost: \$50 ea. Quantity: 2 Reposition the toilet. Unit Cost: \$1,500 ea. Quantity: 2	\$4,900

	<p>The soap dispenser is mounted &gt;44" AFF over an obstruction, @ 51" AFF (women's only).</p>		<p>Install a 42" min. side grab bar, located 12" from the interior corner of the wall. Unit Cost: \$50 ea. Quantity: 1</p> <p>Relocate the stall partition. Unit Cost: \$900 ea. Quantity: 1</p> <p>Relocate the soap dispenser. Unit Cost: \$50 ea. Quantity: 1</p>	
4.	<p><b>Girls' &amp; Boys' Toilet Rooms (near Library)</b></p> <p>The soap dispenser is mounted &gt;44" AFF over an obstruction.</p> <p>The paper towel dispenser and hand dryer protrude &gt;4" into the circulation space, @ 10".</p> <p>The paper towel dispenser controls are mounted &gt;48" AFF, @ 54" AFF.</p> <p>The toilet centerline is not 16"-18" from the side wall, @ 18.5" (girls' only).</p> <p>The coat hook is mounted &gt;48" AFF.</p> <p>The toilet paper dispenser is mounted &lt;12" above the side grab bar, @ 6".</p> <p>The stall lacks a door pull on both sides of the door near the latch.</p> <p>The sink has pipes that are not insulated (boys' only).</p> <p>The rim of the urinal is mounted &gt;17" AFF, @ 17.5" AFF (boys' only).</p>		<p>Relocate the soap dispenser. Unit Cost: \$50 ea. Quantity: 2</p> <p>Install a cane detectable object below the paper towel dispenser and hand dryer. Unit Cost: \$250 ea. Est. Quantity: 6</p> <p>Relocate the paper towel dispenser. Unit Cost: \$50 ea. Quantity: 2</p> <p>Reposition the toilet. Unit Cost: \$1,500 ea. Quantity: 1</p> <p>Install a coat hook mounted no higher than 48" AFF. Unit Cost: \$50 ea. Quantity: 2</p> <p>Relocate the toilet paper dispensers. Unit Cost: \$50 ea. Quantity: 2</p> <p>Install a door pull on both sides of the stall door near the latch.</p>	\$4,400



			Unit Cost: \$50 ea. Quantity: 4  Insulate the pipes. Unit Cost: \$50 ea. Quantity: 1  Lower the urinal. Unit Cost: \$750 ea. Quantity: 1	
5.	<b>Football Field – Designated Accessible Parking</b>  One of the accessible parking spaces lacks the required signage.  The designated accessible parking space and its associated access aisle have slopes > 2%, @ up to 3.3%. (upper spot)		Install the signs at min. 60" AFF, measured to the bottom of the sign, including a van accessible sign. Unit Cost: \$100 ea. Quantity: 1  Regrade and restripe the existing designated accessible parking space and its associated access aisle. Unit Cost: \$1,500 per space or aisle Quantity: 2 (1 space + 1 aisle)	\$3,100
6.	<b>Football Field – Accessible Route</b>  The walkway leading to the upper seating area has running slopes >5%, @ up to 8.6%.  The ramp leading to the designated seating area has running slopes >8.3%, @ 8.5%.  The gate lacks a level landing, @ 7.1%.	 	Regrade the walkway. Unit Cost: \$25/SF Est. Quantity: 30 SF  Rebuild the ramp. Unit Cost: \$15,000 Quantity: 1  Regrade the gate landing. Unit Cost: \$1,000 Quantity: 1	\$16,750

				
7.	<p><b>Football Field –Accessible Route</b></p> <p>The designated accessible seating area at the bleachers is not located on an accessible route.</p> <p>The designated accessible seating area is not stable, firm, and slip resistant, due to grass surfaces.</p>	 	<p>Provide an accessible route and a stable, firm, and slip resistant surface. Additional study required.</p> <p>Unit Cost: \$5,000</p> <p>Quantity: 1</p>	\$5,000
TOTAL FOR MEDFIELD HIGH SCHOOL: \$35,100				







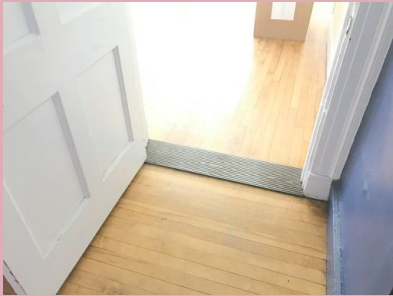
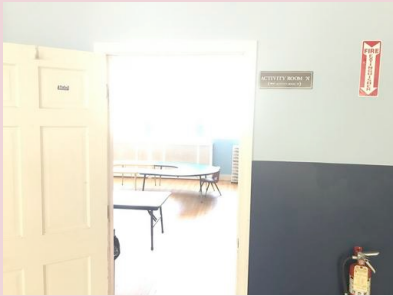
## PFAFF RECREATION CENTER


AUDITED ON: JUNE 9, 2020





The Pfaff Recreation Center is located at 124 North Street. There is surface parking, including one designated accessible parking space. The one-story building consists of various activity rooms, a kitchenette, administrative offices, and two multiuser toilet rooms. The Pfaff Center presents significant ADA issues due to extremely narrow doorways, uneven flooring in the main program area, inaccessible bathrooms requiring significant alterations, and accessibility issues with the building entrance.


#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	<b>Parking</b> The designated accessible parking space and its associated access aisle have slopes >2%, @ 2.8%. The accessible parking space lacks the required signage.		Regrade and restripe the existing designated accessible parking space and its associated access aisle. Unit Cost: \$1,500 per space or aisle Quantity: 2  Install the signs at 60" min. AFF, measured to the bottom of the sign, including a van accessible sign. Unit Cost: \$100 ea. Quantity: 1	\$3,100
2.	<b>Accessible Route to Entrance</b> The accessible route from the accessible parking to the entrance has cross slopes >2%, @ 3.2%.		Regrade the walkway. Unit Cost: \$25/SF Est. Quantity: 150 SF	\$3,750
3.	<b>Entrance</b> The door lacks a level landing, @ 8.6%. The ramp has running slopes >8.3%, @ 8.6%. The ramp lacks compliant handrails.		Rebuild the ramp. Unit Cost: \$15,000 Quantity: 1	\$15,000
4.	<b>Kitchen</b> The sink lacks the required knee and toe clearance for a forward approach. The sink is >34" AFF, @ 35.5" AFF. The range controls require reaching over burners.		Modify the counters, provide knee/ toe clearance at the sink, and replace the range with an accessible appliance. Additional study required. Unit Cost: \$5,000 ea. Quantity: 1	\$5,000

#	Barrier Statement	Photo	Proposed Mitigation	Cost
				
5.	<b>Doors</b> The doors provide <32" clear width, @ 28". The thresholds are >0.5" AFF and not beveled.		Enlarge the door openings and install new doors. Unit Cost: \$5,000 ea. Est. Quantity: 5  Replace the thresholds. Unit Cost: \$250 ea. Est. Quantity: 3	\$25,750
6.	<b>Signage</b> There is no tactile/Braille signage mounted on the latch side of the door.  The designated accessible toilet rooms are not marked with the International Symbol of Accessibility.		Install tactile/Braille signage on the latch side of the door. Include signage with the International Symbol of Accessibility where required. Coordinate with location and height requirements. Unit Cost: \$100 ea. Est. Quantity: 8	\$800
7.	<b>Children's Tables</b> The children's tables lack the required 24" AFF minimum knee clearance for a forward approach, @ 20" AFF.	No Image	Provide at least one table, and no less than 5% of the total number of tables, that provides compliant knee and toe clearance in each location.  Unit Cost: \$250 ea. Est. Quantity: 3	\$750

#	Barrier Statement	Photo	Proposed Mitigation	Cost
8.	<b>Accessible Route</b> The floor is warped and has cross slopes >2%, @ 3.2%.		Regrade the floor surface. Unit Cost: \$2,000 Est. Quantity: 1	\$2,000
9.	<b>AED</b> The AED box protrudes >4" into the circulation space, @ 10". The AED box controls are mounted >48" AFF, @ 60" AFF.		Install a cane detectable object below the AED box. Unit Cost: \$250 ea. Quantity: 1 Relocate the AED box. Unit Cost: \$50 ea. Quantity: 1	\$300
10.	<b>Women's Toilet Room</b> The door maneuvering clearance is <18" on the latch pull-side for a forward approach, @ 2". The changing table is mounted >34" AFF, @ 37" measured to the top of the work surface in the open position. The stall door is not self-closing. The stall lacks a door pull on both sides of the door near the latch. The coat hook is mounted >48" AFF, @ 56" AFF. The toilet seat height is not 17"-19" AFF, @ 16" AFF. The toilet paper dispenser is mounted <12" above the side grab bar, @ 3". The side grab bar extends <54" from the rear wall, @ 38".	 	Install an automatic door opener. Unit Cost: \$2,500 ea. Quantity: 1 Lower the changing table. Unit Cost: \$50 ea. Quantity: 1 Install a self-closing hinge. Unit Cost: \$150 ea. Quantity: 1 Install a door pull on both sides of the stall door near the latch. Unit Cost: \$50 ea. Quantity: 2 Install a coat hook mounted no higher than 48" AFF. Unit Cost: \$50 ea. Quantity: 1 Add a filler seat. Unit Cost: \$150 ea.	\$3,950



#	Barrier Statement	Photo	Proposed Mitigation	Cost
	<p>The mirror is &gt;35" AFF, @ 37" AFF, measured to the bottom of the reflective surface. Note: this mirror is not located above a lavatory.</p> <p>The sink has pipes that are not insulated.</p> <p>The paper towel dispensers and hand dryer protrude &gt;4" into the circulation space, @ 10".</p>		<p>Quantity: 1</p> <p>Relocate the toilet paper dispensers.</p> <p>Unit Cost: \$50 ea.</p> <p>Quantity: 1</p> <p>Install a 42" min. side grab bar, located 12" from the interior corner of the wall.</p> <p>Unit Cost: \$50 ea.</p> <p>Quantity: 1</p> <p>Lower the mirror.</p> <p>Unit Cost: \$50 ea.</p> <p>Quantity: 1</p> <p>Insulate the pipes.</p> <p>Unit Cost: \$50 ea.</p> <p>Quantity: 1</p> <p>Install a cane detectable object below the paper towel dispensers and hand dryer.</p> <p>Unit Cost: \$250 ea.</p> <p>Quantity: 3</p>	
11.	<p><b>Men's Toilet Room</b></p> <p>The door maneuvering clearance is &lt;18" on the latch pull-side for a forward approach, @ 2".</p> <p>The stall door is not self-closing.</p> <p>The stall lacks a door pull on both sides of the door near the latch.</p> <p>The coat hook is mounted &gt;48" AFF, @ 56" AFF.</p> <p>The toilet seat height is not 17"-19" AFF, @ 16" AFF.</p> <p>The knee clearance at the sink is &lt;27" AFF, @ 26.5" AFF.</p> <p>The stall measures &lt;59" deep perpendicular to the rear wall, @ 58".</p> <p>The stall door swings into the minimum required compartment area.</p>		<p>Install an automatic door opener.</p> <p>Unit Cost: \$2,500 ea.</p> <p>Quantity: 1</p> <p>Install a self-closing hinge.</p> <p>Unit Cost: \$150 ea.</p> <p>Quantity: 1</p> <p>Install a door pull on both sides of the stall door near the latch.</p> <p>Unit Cost: \$50 ea.</p> <p>Quantity: 2</p> <p>Install a coat hook mounted no higher than 48" AFF.</p> <p>Unit Cost: \$50 ea.</p> <p>Quantity: 1</p> <p>Add a filler seat.</p> <p>Unit Cost: \$150 ea.</p> <p>Quantity: 1</p> <p>Raise the sink to provide the required knee/toe clearances.</p>	\$8,150

#	Barrier Statement	Photo	Proposed Mitigation	Cost
	<p>The flush valve is not located on the open side of the toilet.</p> <p>The toilet centerline is not 16"-18" from the side wall, @ 14".</p> <p>The toilet paper dispenser is not located 7"-9" from the front of the toilet.</p> <p>The side grab bar extends &lt;54" from the rear wall, @ 38".</p> <p>The sink has pipes that are not insulated.</p> <p>The paper towel dispensers and hand dryer protrude &gt;4" into the circulation space, @ 10".</p>		<p>Unit Cost: \$750 ea. Quantity: 1</p> <p>Relocate the stall partition. Unit Cost: \$900 ea. Quantity: 1</p> <p>Reverse the swing of the stall door. Unit Cost: \$150 ea. Quantity: 1</p> <p>Reposition the flush valve or install an automatic flush control. Unit Cost: \$1,000 ea. Quantity: 1</p> <p>Reposition the toilet. Unit Cost: \$1,500 ea. Quantity: 1</p> <p>Relocate the toilet paper dispensers. Unit Cost: \$50 ea. Quantity: 1</p> <p>Install a 42" min. side grab bar, located 12" from the interior corner of the wall. Unit Cost: \$50 ea. Quantity: 1</p> <p>Insulate the pipes. Unit Cost: \$50 ea. Quantity: 1</p> <p>Install a cane detectable object below the paper towel dispensers and hand dryer. Unit Cost: \$250 ea. Quantity: 3</p>	
TOTAL FOR PFAFF RECREATION CENTER:				\$68,550

## **PUBLIC LIBRARY**

*AUDITED ON: JUNE 9, 2020*



**The Medfield Public Library is located at 468 Main Street. The site consists of a two-story elevated building with an outdoor seating area and gazebo. Parking is available in the rear of the building and includes two designated accessible parking spaces. The first floor includes general stacks and reading rooms. The second floor consists of children's stacks and activity rooms. The lower level includes young adult stacks, computer stations, and private study rooms.**






#	Barrier Statement	Photo	Proposed Mitigation	Cost
	<p><b>Parking</b></p> <p>For a parking lot with two accessible spaces, one must be van accessible. The existing designated accessible parking spaces do not meet the dimensional requirements for a van accessible space.</p> <p>The designated accessible parking spaces lack an associated access aisle.</p> <p>The designated accessible parking spaces have slopes &gt;2%, @ 2.3%.</p>		<p>Regrade and restripe the existing designated accessible parking space and its associated access aisle.</p> <p>Unit Cost: \$1,500 per space or aisle</p> <p>Quantity: 3</p>	\$4,500
	<p><b>Memorial Entrance</b></p> <p>The memorial entrance lacks directional signage to the accessible entrances.</p>		<p>Provide directional signage to the accessible entry.</p> <p>Unit Cost: \$100 ea.</p> <p>Quantity: 1</p>	\$100
12.	<p><b>Side Entrance</b></p> <p>The walkway has running slopes &gt;5% and is not treated as a ramp, @ 7.5%.</p>		<p>Install compliant handrails on both sides.</p> <p>Unit Cost: \$50/LF</p> <p>Est. Quantity: 60 LF</p>	\$3,000

#	Barrier Statement	Photo	Proposed Mitigation	Cost
13.	<b>Accessible Route from Parking to Entrance</b> The walkway leading from the parking lot to the accessible entrance has abrupt changes in level at material transitions.		Regrade the transition between materials. Unit Cost: \$1,000 Quantity: 1	\$1,000
14.	<b>Gazebo</b> The route to the gazebo has an abrupt change in level.		Regrade the transition between materials. Unit Cost: \$1,000 Quantity: 1	\$1,000
15.	<b>Lobby Drinking Fountain</b> The lobby lacks a 'hi' drinking fountain.		Add a 'hi' drinking fountain per ADA-602. Unit Cost: \$1,000 Quantity: 1	\$1,000
16.	<b>Desks &amp; Tables</b> The desks and tables lack the required 27" AFF minimum knee clearance for a forward approach, @ 24"-26" AFF.		Provide at least one table, and no less than 5% of the total number of tables, that provides compliant knee and toe clearance. Unit Cost: \$250 ea. Est. Quantity: 5	\$1,250

#	Barrier Statement	Photo	Proposed Mitigation	Cost
17.	<b>Children's Tables</b> The children's tables lack the required 24" AFF minimum knee clearance for a forward approach, @ 22" AFF. <i>Note: Tables primarily used by children 5 years and younger are permitted to provide a parallel approach.</i>		Provide at least one table, and no less than 5% of the total number of tables, that provides compliant knee and toe clearance. Unit Cost: \$250 ea. Est. Quantity: 2	\$500
18.	<b>Check-Out Counter</b> The counter is >36" AFF, @ 36.5" AFF.		Lower a 36" wide portion of the counter to 36" max. AFF. Unit Cost: \$750 Quantity: 1	\$750
19.	<b>Threshold</b> The threshold leading to the 1 <sup>st</sup> floor reading room is >0.5" AFF and is not beveled.		Replace the threshold. Unit Cost: \$250 ea. Quantity: 1	\$250
20.	<b>Lower Level Ramp</b> The ramp has running slopes >8.3%, @ 9.5%.		Rebuild the ramp. Unit Cost: \$15,000 ea. Quantity: 1	\$15,000

#	Barrier Statement	Photo	Proposed Mitigation	Cost
21.	<p><b>Lobby Single-User Toilet Rooms (2)</b></p> <p>The sink obstructs the minimum required 60" door pull side maneuvering clearance depth.</p> <p>The coat hook is mounted &gt;48" AFF, @ 67" AFF.</p> <p>The knee clearance at the sink is &lt;27" AFF, @ 26.5" AFF.</p> <p>The sink has pipes that are not insulated.</p> <p>The side grab bar extends &lt;54" from the rear wall, @ 48".</p>		<p>Install an automatic door opener. Unit Cost: \$2,500 ea. Quantity: 2</p> <p>Install a coat hook mounted no higher than 48" AFF. Unit Cost: \$50 ea. Quantity: 2</p> <p>Raise the sink to provide the required knee/toe clearances. Unit Cost: \$750 ea. Quantity: 2</p> <p>Insulate the pipes. Unit Cost: \$50 ea. Quantity: 2</p> <p>Install a 42" min. side grab bar, located 12" from the interior corner of the wall. Unit Cost: \$50 ea. Quantity: 2</p>	\$6,800
22.	<p><b>Family Single-User Toilet Rooms (2)</b></p> <p>The designated accessible toilet rooms are not identified with the International Symbol of Accessibility.</p> <p>The coat hook is mounted &gt;48" AFF, @ 67" AFF.</p> <p>The changing table is mounted &gt;34" AFF, @ 42" AFF, measured to the top of the work surface in the open position.</p> <p>The changing table and paper towel dispenser are mounted &lt;12" above the grab bars, @ 3".</p> <p>The side grab bar extends &lt;54" from the rear wall, @ 48".</p>		<p>Install tactile/Braille signage on the latch side of the door. Coordinate with location and height requirements. Unit Cost: \$100 per sign Quantity: 2</p> <p>Install a coat hook mounted no higher than 48" AFF. Unit Cost: \$50 ea. Quantity: 2</p> <p>Relocate the changing table. Unit Cost: \$50 ea. Quantity: 2</p> <p>Relocate the paper towel dispenser. Unit Cost: \$50 ea. Quantity: 2</p> <p>Install a 42" min. side grab bar, located 12" from the interior corner of the wall. Unit Cost: \$50 ea. Quantity: 2</p>	\$600




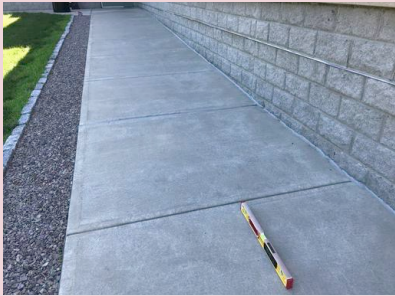


#	Barrier Statement	Photo	Proposed Mitigation	Cost
				
23.	<p><b>Lower Level Single-User Toilet Rooms (2)</b></p> <p>The sink obstructs the minimum required 60" door pull side maneuvering clearance depth.</p> <p>The side grab bar extends &lt;54" from the rear wall, @ 48".</p> <p>The toilet paper dispensers are not located 7"-9" from the front of the toilet.</p>	 	<p>Install an automatic door opener. Unit Cost: \$2,500 ea. Quantity: 2</p> <p>Install a 42" min. side grab bar, located 12" from the interior corner of the wall. Unit Cost: \$50 ea. Quantity: 2</p> <p>Relocate the toilet paper dispensers. Unit Cost: \$50 ea. Quantity: 2</p>	\$5,200
<b>TOTAL FOR PUBLIC LIBRARY:</b>				<b>\$40,950</b>

## PUBLIC SAFETY BUILDING





AUDITED ON: JUNE 9, 2020



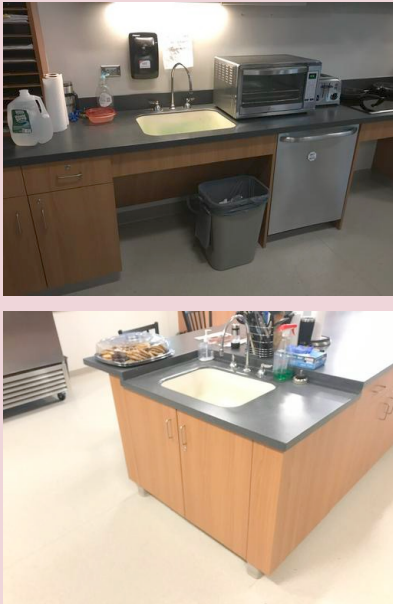
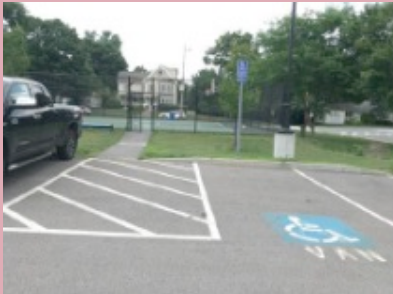
The Public Safety Building is located at 112 North Street. There is surface parking, including two designated accessible parking spaces serving the main entrance and one serving the rear entrance. The two-story building consists of various offices, holding cells, a training room, three locker rooms, four single-user shower rooms, six dormitories, two break rooms, and two single-user toilet rooms.

#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	<b>Rear Parking</b> The designated accessible parking space and its associated access aisle have slopes >2%, @ 2.7%.		Regrade and restripe the existing designated accessible parking space and its associated access aisle. Unit Cost: \$1,500 per space or aisle Quantity: 2	\$3,000
2.	<b>Accessible Route to Rear Entrance</b> The walkway has running slopes >5% and is not treated as a ramp, @ 5.7%.		Regrade the walkway. Unit Cost: \$25/SF Est. Quantity: 175 SF	\$4,375
3.	<b>Interview Room</b> The fixed seat obstructs the required clear floor space at the handcuff bar and table.		Remove the fixed seat. Unit Cost: \$250 Quantity: 1	\$250
4.	<b>Group Holding Cell</b> The bench lacks clear floor space positioned at the end of the bench seat and parallel to the short axis of the bench.  The in-cell emergency button is mounted >48" AFF, @ 49.5" AFF.		Provide an accessible bench with the required clear floor space. Unit Cost: \$500 ea. Quantity: 1  Lower the in-cell emergency button. Unit Cost: \$250 ea. Quantity: 1	\$750



#	Barrier Statement	Photo	Proposed Mitigation	Cost
				
5.	<p><b>Single Holding Cells (3)</b></p> <p>The bench lacks clear floor space positioned at the end of the bench seat and parallel to the short axis of the bench.</p> <p>The sink is &gt;34" AFF, @ 34.5" AFF.</p> <p>The toilet centerline is not 16"-18" from the side wall, @ 19".</p> <p><i>Note: on site KMA was informed that cells were reserved for either male or female detainees. However, it was unclear how that policy was implemented. If the cells are separated as male vs. female, then at least one male and one female cell must be made accessible. If all the cells are all designated as unisex then only one is required to be made accessible.</i></p>	 	<p>Provide an accessible bench with the required clear floor space. Unit Cost: \$500 ea. Quantity: 2 (1 male cell + 1 female cell)</p> <p>Lower the sink to 34" AFF max. Unit Cost: \$3,000 ea. Quantity: 2 (1 male cell + 1 female cell)</p> <p>Reposition the toilet. Unit Cost: \$1,500 ea. Quantity: 2 (1 male cell + 1 female cell)</p>	\$10,000
6.	<p><b>Detainee Shower</b></p> <p>The transfer shower is not 36" x 36", @ 34" x 39".</p>		<p>Rebuild the existing shower. Unit Cost: \$2,200 ea. Quantity: 1</p>	\$2,200

#	Barrier Statement	Photo	Proposed Mitigation	Cost
7.	<b>Administrative Office</b> The counter is >36" AFF, @ 42" AFF.		Lower a 36" wide portion of the counter to 36" max. AFF. Unit Cost: \$750 Quantity: 1	\$750
8.	<b>Men's &amp; Women's Locker Rooms</b> The coat hook is mounted >48" AFF, @ 55" AFF. The rod and shelf are mounted >48" AFF, @ 69" AFF. The benches lack back support (2 <sup>nd</sup> floor only).		Install a coat hook mounted no higher than 48" AFF. Unit Cost: \$50 ea. Est. Quantity: 2 Install a rod and shelf mounted no higher than 48" AFF. Unit Cost: \$50 ea. Quantity: 4 Provide an accessible bench. Unit Cost: \$500 ea. Quantity: 4	\$2,300
9.	<b>Single-User Toilet Rooms (2)</b> The coat hook is mounted >48" AFF, @ 54" AFF. The cabinets obstruct the required clearance at the toilet. The mirror is >40" AFF, @ 41" AFF, measured to the bottom of the reflective surface.		Install a coat hook mounted no higher than 48" AFF. Unit Cost: \$50 ea. Quantity: 2 Remove the cabinet. Unit Cost: \$50 Quantity: 2 Lower the mirror. Unit Cost: \$50 ea. Quantity: 2	\$300

#	Barrier Statement	Photo	Proposed Mitigation	Cost
10.	<p><b>Break Rooms</b></p> <p>The hood controls are &gt;48" AFF, @ 66" AFF.</p> <p>The soap dispenser is &gt;46" AFF over a reach &gt;10" deep, @ 50" AFF.</p> <p>The sink is &gt;34" AFF, @ 34.25" AFF (1<sup>st</sup> floor only).</p> <p>The knee clearance at the sink is &lt;8" deep at 27" AFF, @ 3" (1<sup>st</sup> floor only).</p> <p>The sink lacks the required knee and toe clearance for a forward approach (2<sup>nd</sup> floor only).</p> <p>The pedestal tables do not provide the required knee and toe clearance.</p>		<p>Provide redundant hood controls within an accessible reach range. Unit Cost: \$250 ea. Quantity: 1</p> <p>Relocate the soap dispenser. Unit Cost: \$50 ea. Quantity: 1</p> <p>Lower the counter to 34" AFF max. Unit Cost: \$3,000 ea. Quantity: 1</p> <p>Modify the apron at the sink to provide the required knee clearance. Unit Cost: \$250 ea. Quantity: 2</p> <p>Provide at least one table, and no less than 5% of the total number of tables, that provides compliant knee and toe clearance. Unit Cost: \$250 ea. Est. Quantity: 1</p>	\$4,050
11.	<p><b>Basketball Court - Parking</b></p> <p>The designated accessible parking space and its associated access aisle have slopes &gt; 2%, @ 4.1%.</p>		<p>Regrade and restripe the existing designated accessible parking space and its associated access aisle. Unit Cost: \$1,500 per space or aisle Quantity: 2 (1 space + 1 aisle)</p>	\$3,000

#	Barrier Statement	Photo	Proposed Mitigation	Cost
12.	<b>Basketball Court – Accessible Route</b>  The gate lacks a level landing, @ 4.3%.  The gate maneuvering clearance is < 18” on the latch pull-side for a forward approach, @ 3”.  The bench is not located on an accessible route.		Regrade the gate landing. Unit Cost: \$1,000 Quantity: 1  Extend the concrete surface to provide the required maneuvering clearance at the gate. Unit Cost: \$25/SF Est. Quantity: 10 SF  Provide an accessible route. Additional study required. Unit Cost: \$2,500 Quantity: 1	\$3,750
<b>TOTAL FOR PUBLIC SAFETY BUILDING: \$34,725</b>				

## SENIOR CENTER

AUDITED ON: JUNE 9, 2020



The Senior Center (aka. The Center) is located at 1 Icehouse Road. There is surface parking, including seven designated accessible parking spaces. The one-story building includes a craft room, an activity room, an industrial kitchen, a dining room, a salon, two multiuser toilet rooms, one single-user toilet room, and administrative offices. The entrance to The Center, as well as the side doors have accessibility issues that are currently under study and are slated for repair in the immediate term.



#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	<b>Curb Cut near Flagpole</b> The slope of the flared sides of the curb ramp near the flagpole is >10%, @ 10.3%.		Rebuild the curb ramp. Unit Cost: \$1,250 ea. Quantity: 1	\$1,250
2.	<b>Accessible Route to Main Entrance</b> The running slope of the curb ramp is >8.3%, @ 12.6%. The brick is not flush and has abrupt changes in level.		Rebuild the curb ramp. Unit Cost: \$1,250 ea. Quantity: 1  Regrade the brick. Unit Cost: \$1,000 Quantity: 1	\$2,250
3.	<b>Main Entrance</b> The door does not open a full 90 degrees, due to the raised ground surface.		Install an automatic door opener or modify the ground surface. Unit Cost: \$2,500 ea. Quantity: 1	\$2,500
4.	<b>Telephones</b> The telephones are mounted >48" AFF, @ 57" AFF.		Lower the telephone. Unit Cost: \$250 ea. Est. Quantity: 4	\$1,000

#	Barrier Statement	Photo	Proposed Mitigation	Cost
5.	<b>Craft Room</b> The sink is >34" AFF, @ 36" AFF.		Lower the sink to 34" AFF max. Unit Cost: \$3,000 ea. Quantity: 1	\$3,000
6.	<b>Coat Hooks</b> The coat hooks are mounted >48" AFF, @ 69" AFF.		Install a coat hook mounted no higher than 48" AFF. Unit Cost: \$50 ea. Quantity: 1	\$50
7.	<b>Signage</b> Some signs are not located on the latch side of the door.		Install tactile/Braille signage on the latch side of the door. Coordinate with location and height requirements. Unit Cost: \$100 per sign Est. Quantity: 5	\$500
8.	<b>Activity Room</b> The card tables lack the required knee and toe clearance for a forward approach.		Provide at least one table, and no less than 5% of the total number of tables, that provides compliant knee and toe clearance. Unit Cost: \$250 ea. Est. Quantity: 1	\$250



#	Barrier Statement	Photo	Proposed Mitigation	Cost
9.	<b>Salon</b> The sink is >34" AFF, @ 36" AFF.		Lower the sink to 34" AFF max. Unit Cost: \$3,000 ea. Quantity: 1	\$3,000
10.	<b>Egress Door Thresholds</b> The threshold is >0.5" AFF, @ 2" AFF.		Replace the threshold. Unit Cost: \$250 ea. Quantity: 2	\$500
11.	<b>Coat Closets</b> The closet rod and shelf are mounted >48" AFF, @ 60" AFF.		Lower the rod and shelf. Unit Cost: \$50 ea. Quantity: 2	\$100
12.	<b>Single-User Toilet Room</b> The coat hook is mounted >48" AFF, @ 55.5" AFF. The mirror is >40" AFF, @ 49" AFF, measured to the bottom of the reflective surface. The paper towel dispenser is located <12" above the rear grab bar, @ 11".		Install a coat hook mounted no higher than 48" AFF. Unit Cost: \$50 ea. Quantity: 1  Lower the mirror. Unit Cost: \$50 ea. Quantity: 1  Relocate the paper towel dispenser. Unit Cost: \$50 ea. Quantity: 1	\$2,000

#	Barrier Statement	Photo	Proposed Mitigation	Cost
	<p>The knee clearance at the sink is &lt;8" deep at 27" AFF, @ 6".</p> <p>The toilet centerline is not 16"-18" from the side wall, @ 19".</p> <p>The toilet paper dispenser is not located 7"-9" from the front of the toilet, @ 5".</p> <p>The side grab bar extends &lt;54" from the rear wall, @ 48".</p>		<p>Modify the apron at the sink to provide the required knee depth. Unit Cost: \$250 Quantity: 1</p> <p>Reposition the toilet. Unit Cost: \$1,500 ea. Quantity: 1</p> <p>Relocate the toilet paper dispenser. Unit Cost: \$50 ea. Quantity: 1</p> <p>Install a 42" min. side grab bar, located 12" from the interior corner of the wall. Unit Cost: \$50 ea. Quantity: 1</p>	
13.	<p><b>Multiuser Toilet Room</b></p> <p>The room lacks accessible elements for an accessible toilet room.</p>	No Image	<p>Provide an accessible multiuser toilet room. Additional study required. Unit Cost: \$5,000 ea. Quantity: 1</p>	\$5,000
<b>TOTAL FOR SENIOR CENTER:</b>				<b>\$21,400</b>

## TOWN HOUSE

AUDITED ON: JUNE 9, 2020







**Medfield Town Hall is located at 459 Main Street. There is surface parking provided, including two designated accessible parking spaces at the rear of the building and two more in the adjacent public parking lot on Janes Avenue. The four-story building includes various offices, conference rooms, two kitchenettes, multiuser toilet rooms, and single-user toilet rooms.**

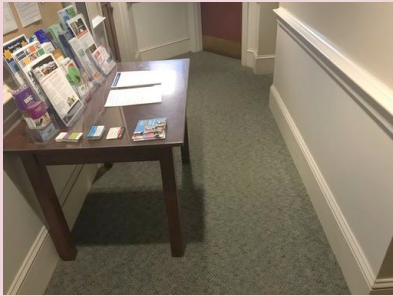

#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	<p><b>Town Hall Parking Lot</b></p> <p>The designated accessible parking space and its associated access aisle have slopes &gt;2%, @ 2.3%-4.3%.</p> <p>The accessible parking spaces lack the required signage.</p>		<p>Regrade and restripe the existing designated accessible parking space and its' associated access aisle.</p> <p>Unit Cost: \$1,500 per space or aisle Quantity: 3 (2 spaces + 1 aisle)</p> <p>Install the signs at 60" min. AFF, measured to the bottom of the sign, including a van accessible sign.</p> <p>Unit Cost: \$100 ea. Quantity: 2</p>	\$4,700
2.	<p><b>Janes Avenue Public Parking Lot</b></p> <p>The designated accessible parking space and its associated access aisle have slopes &gt;2%, @ 3.5%.</p> <p>The accessible parking spaces lack the required signage.</p> <p>The crosswalk has excessive cross slopes &gt;2%, @ 3.6%.</p>	 	<p>Regrade and restripe the existing designated accessible parking space and its' associated access aisle.</p> <p>Unit Cost: \$1,500 per space or aisle Quantity: 3 (2 spaces + 1 aisle)</p> <p>Install the signs at 60" min. AFF, measured to the bottom of the sign, including a van accessible sign.</p> <p>Unit Cost: \$100 ea. Quantity: 2</p> <p>Regrade the crosswalk.</p> <p>Unit Cost: \$25/SF Est. Quantity: 100 SF</p>	\$7,200
3.	<p><b>Picnic Table</b></p> <p>The picnic table is not on an accessible route.</p> <p>The picnic table lacks the required knee and toe clearance for a forward approach.</p>		<p>Provide at least one table, and no less than 5% of the total number of tables, that provides compliant knee and toe clearance on an accessible route.</p> <p>Unit Cost: \$250 ea. Est. Quantity: 1</p>	\$250






#	Barrier Statement	Photo	Proposed Mitigation	Cost
4.	<p><b>Accessible Route near Front Entrance</b></p> <p>The walkway leading from the sidewalk to the front entrance has running slopes &gt;5% and is not treated as a ramp, @ 5.3%.</p> <p>The walkway leading to the flagpole has running slopes &gt;5%, @ 15.1%.</p>		<p>Regrade the walkway leading to the front entrance. Unit Cost: \$25/SF Est. Quantity: 150 SF</p> <p>Regrade the walkway leading to the flagpole. Unit Cost: \$25/SF Est. Quantity: 100 SF</p>	\$6,250
5.	<p><b>Elevator</b></p> <p>The topmost control is mounted &gt;48" AFF, @ 50" AFF.</p>		<p>Relocate the control so it is no higher than 48" AFF. Unit Cost: \$200 ea. Quantity: 1</p>	\$200
6.	<p><b>Computer Station</b></p> <p>The table lacks the required 27" AFF minimum knee clearance for a forward approach, @ 25" AFF.</p>		<p>Provide at least one table, and no less than 5% of the total number of tables, that provides compliant knee and toe clearance. Unit Cost: \$250 ea. Est. Quantity: 1</p>	\$250
7.	<p><b>Kitchenette (1<sup>st</sup> Floor)</b></p> <p>The kitchenette lacks the required footprint and elements to meet the accessibility requirements.</p>		<p>Provide an accessible kitchen. Additional study required. Unit Cost: \$5,000 ea. Quantity: 1</p>	\$5,000

#	Barrier Statement	Photo	Proposed Mitigation	Cost
	<b>Break Room</b>  The pedestal tables do not provide the required knee and toe clearance.  The sink is >34" AFF, @ 36" AFF.	 	Provide at least one table, and no less than 5% of the total number of tables, that provides compliant knee and toe clearance. Unit Cost: \$250 ea. Est. Quantity: 1  Lower the sink to 34" AFF max. Unit Cost: \$3,000 ea. Quantity: 1	\$3,250
	<b>Meeting Room</b>  The conference table lacks the required 17" minimum toe clearance depth, @ 13".		Provide at least one table, and no less than 5% of the total number of tables, that provides compliant knee and toe clearance. Unit Cost: \$250 ea. Est. Quantity: 1	\$250
8.	<b>Counters</b>  The Conservation Commission, Collector's Office, Assessor's Office, and Board of Health counters are >36" AFF, @ 36.5"-43" AFF.		Lower a 36" wide portion of the counter to 36" max. AFF. Unit Cost: \$750 Quantity: 4	\$3,000



#	Barrier Statement	Photo	Proposed Mitigation	Cost
9.	<b>Signage</b> Some signage is mounted >60" AFF to the bottom of the highest line of tactile characters, @ 66" AFF.		Lower the tactile/Braille signage. Unit Cost: \$100 per sign Est. Quantity: 5	\$500
10.	<b>Accessible Route near Board of Health</b> The table obstructs the accessible route to the Board of Health window.		Relocate the table. Unit Cost: \$50 Quantity: 1	\$50
11.	<b>Men's &amp; Women's Single-User Toilet Rooms</b> The door maneuvering clearance is <12" on the latch push-side for a forward approach. The pull side door maneuvering clearance is <60" perpendicular to the doorway, @ 30" due to the sink. The clearance required at the toilet between the wall and the sink is <60", @ 47". The coat hook is mounted >48" AFF, @ 54" AFF. The knee clearance at the sink is <27" AFF, @ 26.5" AFF. The soap dispenser is mounted <12" above the rear grab bar, @ 6". The flush valve is not located on the open side of the toilet.		Install an automatic door opener. Unit Cost: \$2,500 ea. Quantity: 2 Modify the sink counter. Unit Cost: \$250 Quantity: 2 Install a coat hook mounted no higher than 48" AFF. Unit Cost: \$50 ea. Quantity: 2 Raise the sink to provide the required knee/toe clearances. Unit Cost: \$750 ea. Quantity: 2 Relocate the soap dispenser. Unit Cost: \$50 Quantity: 1	\$11,150

#	Barrier Statement	Photo	Proposed Mitigation	Cost
	The toilet centerline is not 16"-18" from the side wall, @ 18.5".		<p>Reposition the flush valve or install an automatic flush control. Unit Cost: \$1,000 ea. Quantity: 1</p> <p>Reposition the toilet. Unit Cost: \$1,500 ea. Quantity: 2</p>	
12.	<p><b>Men's &amp; Women's Multiuser Toilet Rooms</b></p> <p>The designated accessible toilet rooms are not identified with the International Symbol of Accessibility.</p> <p>The door maneuvering clearance is &lt;18" on the latch pull-side for a forward approach, @ 2"-11".</p> <p>The door does not open a full 90 degrees due to the doorstop.</p> <p>The shelf protrudes &gt;4" into the circulation space, @ 8".</p> <p>The soap dispenser is mounted &gt;44" AFF over the sink, @ 50"-60" AFF.</p> <p>The knee clearance at the sink is &lt;27" AFF, @ 26.5" AFF.</p> <p>The clearance between the stall door and the wall is &lt;42", @ 36"-38".</p> <p>The coat hook is mounted &gt;48" AFF, @ 54" AFF.</p> <p>The stall lacks a door pull on both sides of the door near the latch.</p> <p>The stall door is not self-closing.</p> <p>The toilet centerline is not 16"-18" from the side wall, @ 18.5".</p> <p>The flush valve is not located on the open side of the toilet.</p>	  	<p>Install tactile/Braille signage on the latch side of the door. Coordinate with location and height requirements. Unit Cost: \$100 ea. Quantity: 6</p> <p>Install an automatic door opener. Unit Cost: \$2,500 ea. Quantity: 3</p> <p>Relocate the doorstop. Unit Cost: \$50 ea. Quantity: 1</p> <p>Relocate the shelf. Unit Cost: \$50 ea. Quantity: 1</p> <p>Relocate the soap dispenser. Unit Cost: \$50 Quantity: 4</p> <p>Raise the sink to provide the required knee/toe clearances. Unit Cost: \$750 ea. Quantity: 4</p> <p>Relocate the stall partition. Unit Cost: \$900 ea. Quantity: 2</p> <p>Install a coat hook mounted no higher than 48" AFF.</p>	\$34,750

#	Barrier Statement	Photo	Proposed Mitigation	Cost
	The stall is <66" wide and lacks the required toe clearance, @ 60"-62".		<p>Unit Cost: \$50 ea. Quantity: 6</p> <p>Install a door pull on both sides of the stall door near the latch. Unit Cost: \$50 ea. Est. Quantity: 10</p> <p>Install a self-closing hinge. Unit Cost: \$150 ea. Est. Quantity: 3</p> <p>Reposition the toilet. Unit Cost: \$1,500 ea. Est. Quantity: 2</p> <p>Reposition the flush valve or install an automatic flush control. Unit Cost: \$1,000 ea. Quantity: 2</p> <p>Widen the stall. Additional study required. Unit Cost: \$5,000 ea. Quantity: 3</p>	
TOTAL FOR TOWN HALL:			\$ 76,800	

## TRANSFER STATION, SALT SHED, & SWAP SHACK

AUDITED ON: JUNE 9, 2020

The Transfer Station, Salt Shed, and Swap Shack are located at 123 North Meadows Road. Parking is provided at the Trash/Tip building for the public to unload their bulk items.



#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	<b>Trash/Tip Parking</b> Designated accessible parking is not provided. <i>Note: It is unclear whether staff have been trained to assist residents with disabilities.</i>		Pave and stripe a portion of the parking lot to add accessible parking spaces (including at least one van space), as well as the associated access aisles. Unit Cost: \$1,500 per space or aisle Est. Quantity: 2	\$3,000
<b>TOTAL FOR TRANSFER STATION, SALT SHED, &amp; SWAP SHACK:</b>				<b>\$3,000</b>

# EXTERIOR AREA AUDITS

## BAXTER MEMORIAL PARK

AUDITED ON: JULY 09, 2020

The Baxter Memorial Park is located at the intersection of Main Street and Spring Street. The site consists of a memorial and sitting area.



#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	<b>Accessible Route</b> The benches and picnic tables are not located on an accessible route due to grass surfaces. The picnic table is not accessible.	 	Provide an accessible route. Additional study required. Unit Cost: \$10,000 Quantity: 1  Provide at least one table, and no less than 5% of the total number of tables, that provides compliant knee and toe clearance. Unit Cost: \$250 ea. Est. Quantity: 1	\$10,250

TOTAL FOR BAXTER MEMORIAL PARK: \$10,250



## HINKLEY PARK AND POND

AUDITED ON: JULY 09, 2020




Hinkley Park & Pond is located along Green Street. The site consists of a parking lot, a playground, a swim pond, and toilet rooms. There is no accessible route to the common-use elements. Due to COVID-19 restrictions, when the park and pond areas were evaluated, not all equipment serving the swim area was appropriately placed or visible due to closures. Where the audit was impacted by closures it is noted in the barrier statement.



#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	<p><b>Accessible Parking</b></p> <p>The designated accessible parking provided lacks striping, and a stable, firm and slip resistant surface.</p> <p>The signs are mounted &lt; 60" AFF to the bottom of the sign.</p> <p>The accessible route from the parking has running slopes &gt;5%, @ 6.2%.</p>		<p>Pave and stripe a portion of the parking lot to add accessible parking spaces (including at least one van space), as well as their associated access aisles. Unit Cost: \$1,500 per space or aisle Est. Quantity: 3 (2 spaces + 1 aisle)</p> <p>Install the signs at 60" min. AFF, measured to the bottom of the sign, including a van accessible sign. Unit Cost: \$100 ea. Quantity: 2</p> <p>Regrade the walkway. Unit Cost: \$25/SF Est. Quantity: 50 SF</p>	\$5,950
2.	<p><b>Accessible Route</b></p> <p>The benches, picnic tables, playground, book exchange box, swings, and swim pond are not located on an accessible route due to grass and sand surfaces.</p> <p>The slope of the ramp into the playground is &gt;8.3%, @ 10.4%.</p> <p>The picnic tables at the playground and near the serving window are not accessible.</p> <p>The handle of the book exchange box is &gt;48" AFF, @ 58".</p>		<p>Provide an accessible route. Additional study required. Unit Cost: \$20,000 Quantity: 1</p> <p>Rebuild the ramp. Unit Cost: \$10,000 Quantity: 1</p> <p>Provide at least one table, and no less than 5% of the total number of tables, that provides compliant knee and toe clearance. Unit Cost: \$250 ea. Est. Quantity: 2</p> <p>Replace the box with one that has controls that are maximum 48" AFF. Unit Cost: \$1,000 ea. Quantity: 1</p>	\$31,300

#	Barrier Statement	Photo	Proposed Mitigation	Cost
				
3.	<p><b>Swim Pond</b></p> <p>The ramp is not located on an accessible route due to sand and water.</p> <p>The handrails are &gt;33"-36" AFF, @ 37.5".</p> <p>The handrails lack the required extensions at the top and bottom of the ramp.</p> <p><b>Note:</b> ramp was audited while out of place due to closure.</p>		<p>Provide an accessible route. Additional study required.</p> <p>Unit Cost: \$20,000</p> <p>Quantity: 1</p> <p><b>Note:</b> When properly placed, the route is accessible. The pond is also served by a beach chair. The availability of the beach chair should be posted on signage at the lifeguard station.</p>	\$20,000
4.	<p><b>Serving Window</b></p> <p>The serving window is &gt; 36" AFF, @ 37".</p>		<p>Lower a 36" portion of the windows to max. 36" AFF.</p> <p>Unit Cost: \$3,000 ea.</p> <p>Quantity: 1</p>	\$3,000
5.	<p><b>Toilet Rooms</b></p> <p>There is no tactile/ Braille signage mounted on the latch side of the door.</p> <p>The mirror is &gt; 40" AFF, @ 41", measured to the bottom of the reflective surface. (W)</p> <p>The flush valve is not located on the open side of the toilet. (W)</p>		<p>Install tactile/ Braille signage on the latch side of the door. Coordinate with location and height requirements.</p> <p>Unit Cost: \$100 ea.</p> <p>Quantity: 2</p> <p>Lower the mirror.</p> <p>Unit Cost: \$50 ea.</p> <p>Quantity: 1</p>	\$4,350




#	Barrier Statement	Photo	Proposed Mitigation	Cost
	<p>The side grab bar starts &gt; 12" from the side wall, @ 13.5".</p> <p>The toilet centerline is not 16-18" from the side wall, @ 19".</p>		<p>Reposition the flush valve or install an automatic flush control. Unit Cost: \$1,000 ea. Quantity: 1</p> <p>Reposition the side grab bar. Unit Cost: \$50 ea. Quantity: 2</p> <p>Reposition the toilet. Unit Cost: \$1,500 ea. Quantity: 2</p>	
<b>TOTAL FOR HINKLEY PARK &amp; POND:</b>				<b>\$64,600</b>

## METACOMET PARK

AUDITED ON: JULY 09, 2020



**Metacomet Park is located at the intersections of Pleasant Street and Curve Street. The site consists of a parking lot, a playground, four tennis courts, and an open field. No designated accessible parking spaces are provided.**

#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	<p><b>Accessible Parking</b></p> <p>The designated accessible parking space and its associated access aisle have slopes &gt; 2%, @ 3.2%.</p> <p>The parking lot lacks a van accessible space.</p> <p>The access aisle is &lt;60" wide, @ 34".</p>		<p>Regrade and restripe the existing designated accessible parking spaces and the associated access aisles to provide dimensionally compliant access aisles and a van space.</p> <p>Unit Cost: \$1,500 per space or aisle</p> <p>Quantity: 4 (2 spaces + 2 aisles)</p>	\$6,000
2.	<p><b>Accessible Route</b></p> <p>The benches, picnic tables, playground, and sports fields are not located on an accessible route due to grass and sand surfaces.</p> <p>The picnic table is not accessible.</p> <p>A wheelchair space is not provided at the bleachers.</p>	 	<p>Provide an accessible route. Additional study required.</p> <p>Unit Cost: \$20,000</p> <p>Est. Quantity: 1</p> <p>Provide at least one table, and no less than 5% of the total number of tables, that provides compliant knee and toe clearance.</p> <p>Unit Cost: \$250 ea.</p> <p>Est. Quantity: 1</p> <p>Provide an accessible space on an accessible route next to the bleachers.</p> <p>Unit Cost: \$25/SF</p> <p>Quantity: 20 SF</p>	\$20,750



#	Barrier Statement	Photo	Proposed Mitigation	Cost
3.	<b>Route to Pitcher Cage</b> The route to the cage provides < 32" clear width, @ 24".		Enlarge the opening. Unit Cost: \$5,000 ea. Quantity: 1	\$5,000
4.	<b>Toilet Rooms</b> There is no tactile/ Braille signage mounted on the latch side of the door. The door maneuvering clearance is < 18" on the latch pull-side for a forward approach, @ 9.5" due to the sink. The side grab bar starts > 12" from the side wall, @ 12.5". The toilet centerline is not 16-18" from the side wall, @ 19.5". The headroom under the shelf is < 80" AFF, @ 78".	 	Install tactile/ Braille signage on the latch side of the door. Coordinate with location and height requirements. Unit Cost: \$100 ea. Quantity: 2 Install an automatic door opener. Unit Cost: \$2,500 ea. Quantity: 2 Reposition the side grab bar. Unit Cost: \$50 ea. Quantity: 2 Reposition the toilet. Unit Cost: \$1,500 ea. Quantity: 1 Install a cane detectable object below the shelf. Unit Cost: \$250 ea. Quantity: 2	\$7,300
TOTAL FOR METACOMET PARK: \$39,050				



## McCARTHY PARK

AUDITED ON: JULY 09, 2020



**McCarthy Park is located off of Hospital Road. The site consists of two parking lots, six baseball fields, and an open field. No designated accessible parking spaces are provided.**

#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	<b>Accessible Parking</b> Designated accessible parking is not provided and the parking surface is not stable, firm, and slip resistant.		Pave and stripe a portion of the parking lot to add accessible parking spaces (including at least one van space), as well as their associated signs and access aisles. Unit Cost: \$1,500 per space or aisle Est. Quantity: 3 (2 spaces + 1 access aisle)	\$4,500
2.	<b>Accessible Route</b> The athletic fields and the bleachers are not located on an accessible route. A wheelchair space is not provided at the bleachers.	 	Provide an accessible route. Additional study required. Unit Cost: \$10,000 Quantity: 1  Provide an accessible space on an accessible route next to the bleachers. Unit Cost: \$25/SF Quantity: 20 SF	\$10,500
TOTAL FOR MCCARTHY PARK: \$15,000				

## NOON HILL RESERVATION

AUDITED ON JULY 09, 2020

The site is located on Noon Hill Road. The site consists of an unpaved parking lot with an adjacent trailhead. No designated accessible parking spaces and no accessible routes are provided.





#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	<b>Accessible Parking</b> Designated accessible parking is not provided and the parking surface is not stable, firm, and slip resistant.		Pave and stripe a portion of the parking lot to add accessible parking spaces (including at least one van space), as well as their associated access aisles. Unit Cost: \$1,500 per space or aisle Est. Quantity: 2 (1 space + 1 aisle)	\$3,000
2.	<b>Accessible Route</b> The trailhead is not located on an accessible route.		Provide an accessible route. Additional study required. Unit Cost: \$5,000 Quantity: 1	\$5,000
TOTAL FOR NOON HILL RESERVATION:				\$8,000

## ONANDAGA LANE

AUDITED ON: JULY 09, 2020

The site is located at the cul-de-sac of Onandaga Lane. The site consists of a lot and a trail head. No designated accessible parking spaces and no accessible routes are provided.



#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	<b>Accessible Parking</b> Designated accessible parking is not provided.		Stripe a portion of the parking lot to add accessible parking spaces (including at least one van space), as well as their associated signs and access aisles. Unit Cost: \$300 ea. Est. Quantity: 2 (1 space + 1 aisle)	\$600
2.	<b>Accessible Route</b> The trailhead is not located on an accessible route.		Provide an accessible route. Additional study required. Unit Cost: \$5,000 Quantity: 1	\$5,000
<b>TOTAL FOR ONANDAGA LANE:</b>				<b>\$5,600</b>



## KINGSBURY POND

AUDITED ON: JULY 09, 2020

Kingsbury Pond is located along Spring Street. The site consists of a parking area, a pond, and sitting area. No designated accessible parking spaces and no accessible routes are provided.



#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	<b>Accessible Parking</b> Designated accessible parking is not provided and the parking surface is not stable, firm, and slip resistant.		Pave and stripe a portion of the parking lot to add accessible parking spaces (including at least one van space), as well as their associated access aisles. Unit Cost: \$1,500 per space or aisle Est. Quantity: 2 (1 space + 1 aisle)	\$3,000
2.	<b>Accessible Route</b> The benches are not located on an accessible route.		Provide an accessible route. Additional study required. Unit Cost: \$5,000 Quantity: 1	\$5,000
TOTAL FOR KINGSBURY POND: \$8,000				

## RED GATE FARM

AUDITED ON: JULY 09, 2020

The Red Gate Farm is located along Philips Street. At the time of the audit, KMA observed a trail past the locked gate. No parking was provided on site.



#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	<b>Accessible Route</b> The trailhead is not located on an accessible route.		Provide an accessible route. Additional study required. Unit Cost: \$5,000 Quantity: 1	\$5,000
TOTAL FOR RD GATE FARM: \$5,000				



## ENTRANCE TO HOLMQUIST

AUDITED ON: JULY 09, 2020

The entrance to Holmquist is located next to the Wheelock School on Elm Street. The site consists of a pathway leading to various open fields. Parking is provided as well as designated accessible parking spaces.



#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	<b>Accessible Parking</b>  Two of the accessible parking spaces lack the required signage.  The signs are mounted < 60" AFF to the bottom of the sign, @ 56".	A photograph of a paved parking lot with several accessible parking spaces marked with blue paint and white lines. One space has a blue wheelchair symbol.	Install the signs at min. 60" AFF, measured to the bottom of the sign, including a van accessible sign. Unit Cost: \$100 ea. Quantity: 5	\$500
TOTAL FOR ENTRANCE TO HOLMQUIST: \$500				

## MEDFIELD COMMUNITY GARDENS

AUDITED ON: MAY 05, 2020



The Medfield Community Gardens are located along Plain Street. The site consists of several planting lots. Street parking is provided at the site. Although the community gardens are not accessible to those with mobility challenges, the Senior Center offers several accessible gardening tables for therapeutic gardening to Medfield seniors. In order to make gardening fully accessible, the therapeutic gardens would need to open to residents with disabilities of any age.

#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	<b>Accessible Route</b> The gardens and water hoses are not located on an accessible route, due to the surface material.		Provide an accessible route to at least one designated accessible garden area. Additional study required. Unit Cost: \$10,000 Quantity: 1	\$10,000
TOTAL FOR MEDFIELD COMMUNITY GARDENS:				\$10,000

# SECTION 5: PRIORITIZATION PLAN

The Town has made significant progress removing structural barriers to programs in its facilities. Below is a table identifying the principal architectural barriers identified, recommended mitigations and draft implementation schedule. The information below is ordered chronologically by priority.

## General Policies and Procedures

The goal of the Americans with Disabilities Act (ADA) is to provide equal opportunity for people with disabilities. The general principle underlying equal opportunity is protecting the civil rights of people with disabilities so they may enjoy and benefit from the services, programs and activities provided to all people by State and local governments.

#	F i n d i n g s	R e c o m m e n d a t i o n s	S c h e d u l e
1	<p>The Town has made progress fulfilling its Title II administrative requirements of the ADA. The Town Administrator, Kristine Trierweiler, fulfills the responsibility of an ADA Coordinator.</p> <p><b>The following policies and procedures have been developed:</b></p> <p>Equal Employment Opportunity Policy</p>	<ol style="list-style-type: none"> <li>In order to fully ensure compliance, the Town should adopt the following additional written policies:               <ol style="list-style-type: none"> <li>Procedures to ensure meetings, hearings, and other events are held in accessible locations.</li> <li>Establish a formal grievance policy related to ADA complaints.</li> <li>Establish a formal policy or process for responding to request for modifications.</li> </ol> </li> <li>Provide public notice of ADA compliance at building entrances, on the Town's website, within employee handbooks and manuals, meeting/hearing notices, and other announcements.</li> </ol>	<p>Now</p> <p>Now</p>
2	<p>Responses to the department Self-Evaluation Questionnaires indicate that not all personnel have a clear understanding regarding the extent of the Town's program access obligations and ADA requirements.</p> <p>Town employees have received training as part of the SETP Planning Process to increase their awareness of the Town's obligations to provided accessible programs, services, facilities, and employment opportunities.</p>	<ol style="list-style-type: none"> <li>The Town's ADA Coordinator should obtain additional ADA training to ensure compliance with Title II.               <ol style="list-style-type: none"> <li>Additional training opportunities for ADA Coordinators are offered through the ADA National Network <a href="http://www.adata.org/adatraining">www.adata.org/adatraining</a></li> <li>Develop and provide ADA training for all staff and new hires on an ongoing basis to ensure that everyone is aware of their role in meeting the Town's responsibilities.</li> </ol> </li> </ol>	1 Year
3	<p>The Town does not have an Effective Communications Policy to ensure equal access for people with disabilities to participate in local government.</p>	<ol style="list-style-type: none"> <li>The Town should develop an Effective Communications policy including alternative format policy and procedures; website accessibility policy; interpreter services policy; assistive listening device policy; and television captioning policy.</li> </ol>	1 Year

#	F i n d i n g s	R e c o m m e n d a t i o n s	S c h e d u l e
4	<p><b>Emergency Preparedness.</b> The Town has a Coordinated Emergency Management Plan. However, the plan lacks information regarding a coordination to ensure equal access to safe egress or evacuation.</p>	<ol style="list-style-type: none"> <li>1. The Town should review their emergency preparedness plan to ensure that it provides equal access to safe egress for any visitor, member of the community or employee, including additional assistance if required to effectively alter, evacuate, and/or shelter them during an emergency. To ensure equal access to safe egress for individuals with disabilities, develop protocols and signage for such issues as: <ul style="list-style-type: none"> <li>• Fire Exits signage and maneuvering space</li> <li>• Safe Wait Areas</li> <li>• Evacuation Maps</li> <li>• Information should be developed and disseminated regarding the locations of fire exits and safe wait areas serving each municipal space.</li> <li>• Public and Employee Orientation to the Town's Emergency Evacuation Procedures</li> </ul> </li> </ol>	2 Years

## Effective Communications

Under the Americans with Disabilities Act (ADA), State and local governments must ensure **effective communication** with individuals with disabilities. Public entities are required to provide appropriate **auxiliary aids and services**, where necessary, to ensure that communications with individuals with disabilities are as effective as communications with others. In addition, telephone emergency services, including 9-1-1 services, must provide **direct access** to individuals with speech or hearing impairments.

	F i n d i n g s	R e c o m m e n d a t i o n s	S c h e d u l e
5	<p>The Town's Website, a key method of communication, attempts to be optimized for use by people with disabilities. The website includes information on accessibility and provides contact information should a user encounter any unreadable documents. Presently, most of the website is accessible but many forms and reports are uploaded as PDF documents.</p> <p>The website lacks information regarding access to programs and services for people with disabilities.</p>	<ol style="list-style-type: none"> <li>1. The Town should establish a policy to ensure that its web pages will be accessible, and create a process for implementation.</li> <li>2. Ensure the accessibility of all new and modified web pages and content: <ol style="list-style-type: none"> <li>i. Check that the code of all new or modified web pages is valid and fix any broken links.</li> <li>ii. If images are used, make sure each image has alternative-text (alt-text) and/or a long description.</li> <li>iii. If a web page has an online form or contains tables, ensure that all the form fields and the information in the table are accessible.</li> <li>iv. When posting documents to a website for download, especially if providing a document in the Portable Document Format (PDF), provide the document as an accessible web page and/or in a text-based</li> </ol> </li> </ol>	<p>6 Months</p> <p>1 Year</p>

	Findings	Recommendations	Schedule
		<p>format such as Word (.doc extension) or plain Text (.txt extension).</p> <p>3. Develop a plan for making the Town's existing web content more accessible:</p> <ul style="list-style-type: none"> <li>i. Consider making the more frequently used web pages a priority.</li> <li>ii. Describe the plan on an accessible web page and encourage public input on improvements.</li> <li>iii. Include information about the web accessibility standards or guidelines that are being used.</li> <li>iv. Ensure that in-house staff and contractors responsible for web page and content development are properly trained and familiar with web accessibility.</li> <li>v. Provide a way for visitors to request accessible information or services by posting a telephone number or email address on the Town's home page.</li> <li>vi. Establish procedures to assure a quick response to users with disabilities who are trying to obtain information or services in this way.</li> <li>vii. Periodically enlist disability groups to test pages for ease of use; use this information to increase accessibility.</li> </ul>	1 Year
6	<p>The Town is currently providing communications in alternative formats on a limited basis, typically upon request. The most common request is for electronic format materials, and secondarily, large format print materials. The Town also provides TTY/TTT telephone relay access, and utilizes the CodeRED emergency notification system, which allows Town Officials to send voice notifications, emails or text messages to residents and businesses who have signed up for the service.</p>	<p>1. The Town should develop an Effective Communications policy including alternative format policy and procedures, website accessibility policy, interpreter services policy, assistive listening device policy, and television captioning policy.</p> <ul style="list-style-type: none"> <li>i. A method for securing assistive devices or services should be developed and distributed to Town Staff, including guidance on when and where these services will be provided.</li> <li>ii. Policies should also describe how any assistive communications equipment is maintained in operable working order, may be used effectively by people with disabilities, and staff is trained in its use.</li> <li>iii. The Town should ensure that public meetings that are broadcast on cable TV are available with closed captioning to satisfy effective communications requirements.</li> <li>iv. In addition, telephone emergency services, including 9-1-1 services, must provide direct access to individuals with speech or hearing impairments</li> </ul>	1 Year



Findings		Recommendations	Schedule
7	Responses to the questionnaire indicate that personnel do not advertise about the accessibility of their respective department services and/or availability of accommodations – particularly on key documents, such as hearing notices.	1. Notices for Town services, events, and programs should contain language that informs people with disabilities how to request accommodations, and the notices should be posted in prominent physical locations as well as to the Town’s website.	Now
8	Responses to the questionnaires indicate the need to establish the capacity across most Town departments to provide auxiliary aids and services and then to disseminate information about their availability. As part of the training administered with the questionnaire, staff were instructed to contact Kristine Trierweiler, the Town’s ADA coordinator if they receive requests for auxiliary aids.	1. Resources for alternate formats for printed materials (large print, CD, Braille), assistive listening systems, sign language interpreters, text telephones (TTYs) and relay services, accessible websites, and captioning of audiovisual materials can be found in the Appendix of this plan. These resources should be incorporated into the Town’s effective communications policy.	1 Year
9	Questionnaires and interviews indicate that Town staff have not received training on interacting effectively with people with disabilities or been provided with guidelines on basic disability etiquette.	1. Resources on etiquette, person-first language, and non-discriminatory interactions can be found in the Appendix of this report and distributed to Town staff. 2. Training opportunities on effective communication should be marketed to Town staff on a routine basis to increase and promote ongoing awareness of the Town’s responsibilities not to discriminate.	Now  Ongoing

## Employment

Title II of the Americans with Disabilities Act (ADA) requires that public entities include an **examination of their employment policies, practices and activities as part of their self-evaluation**. Employment activities include the application process, testing, interviewing, hiring, job assignment, evaluation, discipline, medical examinations, compensation, promotion, on-the-job training, layoff/recall, termination, leave and benefits such as health insurance.

Findings		Recommendations	Schedule
10	Responses to questionnaires and interviews indicate that not all staff has received training on the Town’s responsibilities to avoid discrimination in the employment process for both new and existing hires.  Although the Town has adopted an ADA Grievance Policy and an Equal Employment Opportunity Policy, many employees were not aware the Town had done so prior to the training that occurred as part of the questionnaire process.	1. The Town should distribute its recently adopted ADA Grievance Policy and Equal Employment Opportunity Policies to employees on an annual basis to ensure ongoing awareness of these policies and procedures.	Now
11	New job postings contain clear language indicating that Medfield is an Equal Opportunity Employer.	1. Review existing and new job descriptions to ensure that they meet non-discrimination requirements.	Now

Findings		Recommendations	Schedule
	However, responses during interviews indicated that some department heads were not aware of the Town's responsibility not to discriminate in employment, and have not been given clear guidance on the provision of reasonable accommodations to employees, job applicants, and contractors. Moreover, there was a limited awareness of what a reasonable accommodation in employment entails, particularly for short-term disabilities, such as those caused by injuries on the job.	2. Ensure that interviews are conducted in accessible locations, and requests for reasonable accommodations such as interpreter services or materials in alternate formats are met, unless undue hardship would result.	Now
		3. Staff responsible for conducting interviews should receive training so they are aware of the non-discrimination requirements (e.g., what types of questions are impermissible, how to provide reasonable accommodations for the job interview process, and medical examination requirements).	1 Year
		4. Employment manuals should be reviewed on an ongoing basis to ensure that they are consistent with the ADA. The existing disability accommodation section narrowly defines "disability", does not discuss essential job functions, reasonable modifications for applications, work environments, or employee benefits, and should be reviewed by legal counsel and modernized.	6 Months
		5. Employment policies and practices should be examined on an ongoing basis to ensure that they do not inadvertently discriminate against employees with disabilities. More training is needed for department heads who oversee staff or interview processes on the topic of reasonable accommodations.	Ongoing
		6. Policies and practices for providing reasonable accommodations should be established where they do not already exist.	Ongoing
12	Responses to the questionnaire indicate that personnel do not advertise about the accessibility of their respective department services and/or availability of accommodations – particularly on key documents, such as hearing notices.	1. Notices for Town services, events, and programs should contain language that informs people with disabilities how to request accommodations, and the notices should be posted in prominent physical locations as well as to the Town's website.	Now

## Structural

Title II of the Americans with Disabilities Act of 1990 (ADA) included the ADA Standards for Accessible Design (1991 Standards), which were revised and updated in 2010 (2010 Standards) and allowed for the 1991 Standards to be used until March 14, 2012. The 2010 Standards set minimum requirements – both scoping and technical – for newly designed and constructed or altered State and local government facilities to be readily accessible to and usable by individuals with disabilities.

#	Building	Principal Barrier(s)	Recommendation(s)	Schedule
13	Town Hall	<ul style="list-style-type: none"> <li>Accessible parking spaces have slopes &gt;2% and lack the required signage.</li> </ul>	Due to the high traffic of Town Hall, KMA recommends mitigating all of the barriers identified in the audit report.	2 Years

#	Building	Principal Barrier(s)	Recommendation(s)	Schedule
		<ul style="list-style-type: none"> <li>• The crosswalk at the James Ave parking area has cross slopes &gt;2%.</li> <li>• Toilet rooms have accessible elements mounted in incorrect locations and/or missing and lack some of the required clearances at fixtures and doors.</li> <li>• Department counters are mounted too high.</li> <li>• Tactile/ braille signage is mounted too high.</li> <li>• Furniture obstructs the accessible route to the Board of Health.</li> <li>• The elevator controls are too high.</li> <li>• The computer station lacks the required knee/ toe clearance for a forward approach.</li> <li>• The picnic table is not on an accessible route and lacks the required knee/ toe clearance for a forward approach.</li> <li>• The kitchenette lacks the required footprint and accessible elements.</li> <li>• The breakroom sink is too high and lacks accessible seating.</li> <li>• The curb ramp at the building entry has cross slopes &gt;2%.</li> <li>• The entry door push button control clear floor space has slopes &gt;2% and the defibrillator controls are mounted too high.</li> <li>• The multiuser toilet room</li> </ul>	<p>KMA recommends prioritizing the exterior parking and accessible routes due to their high visibility.</p> <p>In the more immediate future, KMA recommends designating the toilet rooms as unisex and modifying at least one per floor to be fully accessible.</p> <p>Provide adjacent lowered desks at the department counters that are mounted too high.</p>	<p>6 Months</p> <p>1 Year</p> <p>6 Months</p>

#	Building	Principal Barrier(s)	Recommendation(s)	Schedule
		<p>thresholds are too tall and some elements are not mounted in the correct locations.</p> <ul style="list-style-type: none"> <li>• There are no drinking fountains for standing users.</li> <li>• No accessible employee parking spaces and the employee parking lot is not on an accessible route.</li> </ul>		
14	Transfer Station, Salt Shed, & Swap Shack	<ul style="list-style-type: none"> <li>• No accessible parking.</li> </ul>	Since a policy mitigation for the Transfer Station, Salt Shed, and Swap Shack will address both the program access and architectural barrier issues identified, KMA recommends ensuring trained staff is available to assist people with disabilities.	1 Year
15	Senior Center	<ul style="list-style-type: none"> <li>• Curb ramps are too steep.</li> <li>• The brick surface at the entry has abrupt changes in level.</li> <li>• The entry door is not capable of opening 90 degrees to provide the required clear width/ maneuvering clearances.</li> <li>• The single user toilet room has accessible elements mounted in incorrect locations and/or missing. The multiuser toilet rooms lack the required footprint for an accessible bathroom.</li> <li>• Tactile/ braille signage is not mounted on the latch side of the door.</li> <li>• Coat hooks and hanging rods are too high.</li> <li>• The craft room sink is too high.</li> <li>• The card tables lack the required knee/ toe clearance for a forward approach.</li> <li>• Egress door thresholds are</li> </ul>	<p>Due to the high traffic of the Senior Center and the fact that it serves an aging population, KMA recommends mitigating all of the barriers identified in the audit report.</p> <p>KMA recommends prioritizing the exterior parking and entry door due to their high visibility.</p>	<p>2 Years</p> <p>1 Year</p>

#	Building	Principal Barrier(s)	Recommendation(s)	Schedule
		<p>too high.</p> <ul style="list-style-type: none"> <li>Employee telephones are mounted too high.</li> </ul>		
16	Public Library	<ul style="list-style-type: none"> <li>The parking lot lacks a van accessible parking space.</li> <li>The accessible parking spaces lack access aisles and have slopes &gt;2%.</li> <li>The memorial entrance lacks directional signage to the accessible entrances.</li> <li>The accessible route to the side entrance has running slopes &gt;5%.</li> <li>There are abrupt changes in level &gt;1/4" at material transitions.</li> <li>The lower level ramp has running slopes &gt;8.3%.</li> <li>Desks and tables lack the required knee clearance below (both adult and children).</li> <li>The lobby lacks a 'hi' drinking fountain.</li> <li>The check-out counter is &gt;36" AFF.</li> <li>The threshold leading to the first floor reading room is too high and not beveled.</li> <li>Toilet rooms have accessible elements mounted in incorrect locations and/or missing. The lower level toilet rooms lack the required clearance at the toilet.</li> </ul>	<p>Due to the high traffic of the Library, KMA recommends mitigating all of the barriers identified in the audit report within the next two years.</p> <p>Additionally, in the more immediate future KMA recommends prioritizing the following:</p> <ul style="list-style-type: none"> <li>Exterior parking and accessible routes due to their high visibility.</li> <li>Provide directional signage at the inaccessible entry</li> <li>Designate the toilet rooms as unisex and modify at least one to be fully accessible. Ensure the bathroom can be accessed via an accessible route.</li> <li>Ensure the programs on the lower level (that require the use of the ramp) are capable of being provided in the alternative locations. If alternative locations are used, information on their location and the process for requesting their use must be disseminated.</li> <li>Provide an accessible desk and table (both adult and children sized).</li> <li>Provide paper cups adjacent to the drinking fountain so that it can be utilized by standing users.</li> </ul>	<p>2 Years</p> <p>1 Year</p>
17	Pfaff Recreation Area	<ul style="list-style-type: none"> <li>The accessible parking has slopes &gt;2% and lacks the required signage.</li> <li>The accessible route to the</li> </ul>	<p>Due to the moderate traffic of the Pfaff Recreation Area, KMA recommends mitigating all of the barriers identified in the audit report.</p>	3 Years



#	Building	Principal Barrier(s)	Recommendation(s)	Schedule
		<p>entrance has cross slopes &gt;2%.</p> <ul style="list-style-type: none"> <li>The ramp at the entrance has running slopes &gt;8.3% and lacks compliant handrails.</li> <li>The entry door lacks a level landing.</li> <li>Doors lack the required minimum 32" of clear width.</li> <li>Thresholds are too high and not beveled.</li> <li>Tactile/ braille signage is not provided.</li> <li>The accessible route through the large recreation space has cross slopes &gt;2%.</li> <li>Toilet rooms have accessible elements mounted in incorrect locations and/or missing.</li> <li>Children's tables lack the required knee/ toe clearance.</li> <li>The kitchen sink is mounted too high and lacks the required knee/ toe clearance for a forward approach.</li> <li>The range appliance requires reaching over the burners to access the controls.</li> <li>The AED box protrudes into the circulation area and the controls are mounted too high.</li> </ul>	<p>KMA recommends prioritizing the exterior parking and accessible routes due to their high visibility.</p> <p>Additionally, within the more immediate future:</p> <ul style="list-style-type: none"> <li>designate the toilet rooms as unisex and modify at least one to be fully accessible. Ensure the bathroom can be accessed via an accessible route.</li> <li>provide tactile/ braille signage</li> </ul> <p>Designate alternative accessible meeting areas for all programs that meet in areas not on an accessible route. Ensure that all programs offered are capable of being provided in the alternative locations (i.e., recreation programs). If alternative locations are used, information on their location and the process for requesting their use must be disseminated.</p>	<p>1 Year</p> <p>6 Months</p>
18	Medfield High School	<ul style="list-style-type: none"> <li>The access aisle at the van space is &lt;96" wide.</li> <li>The football accessible parking lacks signage and has slopes &gt;2%.</li> <li>The walkway and the ramp leading to the football field</li> </ul>	<p>Due to the high traffic at the Medfield High School for Town events, KMA recommends mitigating all of the barriers identified in the audit report.</p>	3 Years

#	Building	Principal Barrier(s)	Recommendation(s)	Schedule
		<p>have excessive running slopes. Additionally, the gate lacks a level landing.</p> <ul style="list-style-type: none"> <li>• The football bleachers lack accessible seating located on a stable, firm, and slip resistant surface.</li> <li>• Toilet rooms have accessible elements mounted in incorrect locations and/or missing.</li> <li>• The cafeteria lift door lacks a level landing.</li> </ul>		
19	Public Safety Building	<ul style="list-style-type: none"> <li>• The accessible parking has slopes &gt;2%.</li> <li>• The accessible route to the rear entrance has running slopes &gt;5%.</li> <li>• The single user toilet rooms have accessible elements mounted in incorrect locations and furniture obstructing required fixture clearances.</li> <li>• The administrative office counter is mounted &gt;36" AFF.</li> <li>• The basketball court accessible parking has slopes &gt;2%.</li> <li>• The basketball court gate lacks a level landing and the required maneuvering clearances. Additionally, the basketball court bench is not located on an accessible route.</li> <li>• The fixed seat obstructs the required clear floor space at the handcuff area.</li> <li>• The benches in the cells lack the required clear floor space.</li> </ul>	<p>The public may need to access the jail cell; therefore providing at least one fully accessible jail cell is essential. Mitigate at least one jail cell to be fully accessible. Ensure information on the accessible jail cell is properly disseminated.</p> <p>KMA also recommends prioritizing areas open to the public, the exterior parking, and accessible routes due to their high visibility and extensive use.</p>	<p>3 Years</p> <p>6 Months</p>

#	Building	Principal Barrier(s)	Recommendation(s)	Schedule
		<ul style="list-style-type: none"> <li>• The emergency button in the group cell is mounted too high.</li> <li>• In the single person cells the sinks are mounted too high and the toilet CLs are not 16"-18" from the sidewall.</li> <li>• The detainee shower does not meet the dimensional requirements for an accessible transfer shower.</li> <li>• The employee locker room shelving and hooks are mounted too high. Additionally the benches lack the required back support.</li> <li>• The employee break rooms have appliance/ fixture controls are too high, have sinks that lack the required knee/ toe clearance, have sinks that are mounted too high, and lack accessible seating.</li> </ul>		
20	Department of Public Works	<ul style="list-style-type: none"> <li>• The parking area lacks a van accessible space and accessible parking signage.</li> <li>• The toilet room sink and mirror are too high and the door requires &gt;5lbs of force to operate.</li> <li>• The employee breakroom lacks accessible seating and a work surface. Additionally, appliance controls are mounted too high.</li> </ul>	<p>Since the mitigations noted in the audit report for the areas accessed by the public are relatively small (parking, toilet room) KMA recommends mitigating them in the more immediate future.</p> <p>Due to the relatively low traffic of this building, KMA recommends mitigating the other barriers identified in the audit report as part of routine maintenance, planned alterations or in response to a specific request and as Town budget permits.</p>	<p>1 Year</p> <p>5 Years</p>
21	Dwight-Derby House	<ul style="list-style-type: none"> <li>• No accessible parking.</li> <li>• No accessible route from parking</li> <li>• Not enough accessible entrances.</li> <li>• Thresholds are too high.</li> </ul>	KMA requires more information on the types of programs provided at the Dwight-Derby House. If it is used as a museum or for tours one alternative solution would be to provide an alternative means of providing a tour of the facility (i.e. video walkthrough).	TBD

#	Building	Principal Barrier(s)	Recommendation(s)	Schedule
		<ul style="list-style-type: none"> <li>• The mirror and coat hook in the toilet room are too high</li> <li>• The kitchen sink is too high.</li> </ul>		

## Athletic Facilities

KMA did not observe any fully accessible athletic facilities in the Town of Medfield. KMA reviewed the basketball court at the Public Safety Building, the Medfield High School football field, Metacomet Park, and McCarthy Park. Athletic facilities lack accessible routes, accessible parking, and accessible seating.

**FINDING 21A:** Due to the high traffic of the Medfield athletic facilities, KMA recommends providing accessible athletic facilities within the next 5 years. At least one of each type of athletic facility (e.g. baseball field, football field, basketball court, etc.) should be made accessible, with priority going to those with the highest use. Associated press boxes and/ or concession stands, should also be modified either through physical architectural barrier removal or by implementing a policy change.

**FINDING 21B:** Prior to the next season opening, at least one bathroom (if provided) serving each athletic facility should be designated as unisex and made fully accessible. This can be achieved by providing an accessible portable toilet at each location where bathrooms are provided. Ensure the accessible portable toilet is located on an accessible route.

## Community Garden

The Community Garden is not accessible. The area lacks an accessible route to the garden area.

**FINDING 22:** Since the Community Garden is a unique program and used by many residents of the Town, KMA recommends providing at least one garden on an accessible route within the next 2 years. This can be achieved through architectural barrier removal at the existing Community Garden or by providing an additional accessible garden area in an alternate location. For example, providing raised beds at the Senior Center located on an accessible route available for community use. KMA recommends ensuring that the information on the policy and the process for implementation is disseminated.

## Play and Recreation Areas

KMA did not observe any fully accessible play areas in the Town of Medfield. KMA reviewed the recreation area at Hinkley Park & Pond. The area lacks an accessible route, accessible play features, accessible seating, an accessible serving window, accessible bathrooms, and accessible parking spaces.

**FINDING 23A:** Provide at least 1 fully accessible toilet room within the next 3 years. It is KMA's opinion that a fully accessible bathroom should be a top priority as it will be able to serve everyone who uses the area.

**FINDING 24B:** Provide 1 fully accessible playground within the next 3 years. Ensure that any modifications to an existing play area is done in compliance with the 2010 ADA Standards. Information regarding the accessible playgrounds should be disseminated to residents and available on the Town website.

## Conservation Areas, Trails, and Parks

KMA did not observe any fully accessible conservation areas, trails, or parks in the Town of Medfield. KMA reviewed the Baxter Memorial Park, the Noon Hill Reservation, Onondaga Lane, Kingsbury Pond, Red Gate Farm, and the entrance to Holmquist. The areas lack accessible parking spaces, accessible seating (where seating is provided), and accessible routes.

**FINDING 25A:** Provide accessible parking and a route to the trailhead at one of the conservation areas within the next 5 years, with priority going to the one that has the highest use.



**FINDING 25B:** Provide an accessible route to the memorial at Baxter Memorial Park within the next 5 years. Additionally, provide at least one accessible picnic table on an accessible route in the park.

**FINDING 25C:** With the recent acquisition of a Rail Trail Right of Way, the Town should construct the trail so that it meets ADA accessibility requirements. The Town should construct accessible parking at trail heads to provide for access to walking trails, conservation areas and parks.



# SECTION 6: RESOURCES

There are a number of resources available to assist the Town with the implementation of their Transition Plan and to ensure it meets its obligations to its residents.

## Grant Funding

### Massachusetts Community Development Block Grant Program (CDBG)

CDBG is a federally funded, competitive grant program designed to help small cities and towns meet a broad range of community development needs. Eligible projects include but are not limited to housing rehabilitation or development, micro-enterprise or other business assistance, infrastructure, community/public facilities, public social services, planning, removal of architectural barriers to allow access by persons with disabilities, and downtown or area revitalization. More information about the program can be found here: <https://www.mass.gov/service-details/community-development-block-grant-cdbg>

### Massachusetts Municipal ADA Improvement Grant Program

The Massachusetts Office on Disability (MOD) administers the Municipal ADA Improvement Grant program. This funding is aimed at supporting capital improvements to improve programmatic access and/or removing barriers encountered by people with disabilities. Project grants of up to \$250,000 are available. There are also planning grants to assist communities in creating or updating a Self-Evaluation and/or Transition Plan. More information about the program can be found here: <https://www.mass.gov/municipal-americans-with-disabilities-act-grant>

### Massachusetts Cultural Facilities Fund

The Massachusetts Cultural Council and MassDevelopment provides cultural organizations, including Municipalities that own cultural facilities that are at least 50,000 square feet, with grant funding to support three project types: Feasibility and Technical Assistance grants; Systems Replacement Plan Grants; and Capital grants. Feasibility and Technical Assistance grants of up to \$50,000 are available for costs and expenses related to overall planning and feasibility for a project. Systems replacement plan grants of up to \$7,000 are available to support the development of a capital needs assessment of a building and its mechanical system. Capital grants ranging from \$250,000-\$675,000 are available for acquisition, design, construction, repair, renovation, rehabilitation or other capital improvements. In order for a municipality to be eligible to apply for this funding, it must demonstrate that 50% or more of the facility is used for arts, humanities, or interpretative science programming. All grant programs require a 1-1 match. More information about the program can be found here: <http://www.massculturalcouncil.org/facilities/facilities.htm>

### Complete Street Funding Program

A Complete Street is one that provides safe and accessible options for all travel modes - walking, biking, transit and vehicles – for people of all ages and abilities. MassDOT provides funding to municipalities for technical assistance to analyze their community needs and develop a Complete Streets Prioritization Plan, and funding for construction of Complete Streets infrastructure projects. Also inherent in the development of a Complete Street is meeting the most current accessibility guidelines outlined by the Americans with Disabilities Act (ADA) and the Massachusetts Architectural Access Board (AAB), which are upheld by Code of Massachusetts Regulations 521 (521 CMR). MassDOT has allocated \$12.5 million for the first two years, 2016 and 2017. Future funding will be based on the availability of funds and the interest and success of the program. More information about the program can be found here:

<http://www.massdot.state.ma.us/highway/DoingBusinessWithUs/LocalAidPrograms/CompleteStreets.aspx>

## **Community Transit Grant Program**

MassDOT administers the Community Transit Grant Program which is the annual competitive grant program to distribute Federal Transit Administration Section 5310: Enhanced Mobility of Seniors & Individuals with Disabilities funds, and State Mobility Assistance Program funds. This grant program provides funding to assist with mobility management activities, the purchase of capital equipment, and operational costs to meet the mobility needs of seniors, defined as those 65 and older and individuals with disabilities of any age.

State Mobility Assistance Program (MAP) funds are to assist in the provision of transportation services to seniors and persons with disabilities. MAP funding is exclusively used for the purchase of eligible vehicles, and most often as a State financial match to federally funded capital vehicle purchases. More information about the program can be found here:

<http://www.massdot.state.ma.us/transit/CommunityTransitGrantProgram/ProgramInformation.aspx>

## **Services**

### **MassRelay Service**

The Massachusetts Department of Mental Health operates the MassRelay service. This service is provided 24 hours, seven days a week, 365 days a year and enables people who are deaf, hard of hearing, late deafening, or speech disabled to communicate with hearing people over regular phone lines. A Relay Operator will complete your call, dialing the party you wish to contact and then stay on the line to relay messages electronically via a TTY or verbally to people who can hear. Dial 711 in Massachusetts or 1-800-439-0183 from anywhere else.

### **Massachusetts Commission for the Deaf & Hard of Hearing (MCDHH) Statewide Interpreter/CART Referral Service**

The MCDHH provides statewide interpreter and Communication Access Realtime Translation (CART) referral services. It provides referral services for sign language, spoken English, oral, tactile and close vision interpreting for Deaf and Deaf-Blind individuals, as well as making referral to freelance CART providers for services. They also provide an after-hours emergency interpreter service, an interpreter screening service, interpreter and CART provider trainings, case management, and technical assistance. More information can be found here:

<http://www.mass.gov/eohhs/gov/departments/mcdhh/programs/cart/>

## **Training and Technical Assistance**

### **Massachusetts Commission for the Deaf & Hard of Hearing (MCDHH)**

MCDHH, through the Communication Access, Training, and Technology Services Department (CATTS) provides information and training to the public on issues of deafness and hearing loss. Free in-service or educational services/presentations can be provided for any organization or business seeking to improve their effectiveness in interacting with people who are deaf and hard of hearing. They also provide technical assistance on assistive technology to public and private agencies, professional organizations, businesses and individuals related to all aspects of technology for the deaf and hard of hearing individuals. In addition, they also create a number of publications with a wide range of topics related to deafness and hard of hearing. For more information visit their website at:

<http://www.mass.gov/eohhs/gov/departments/mcdhh/programs/communicate-train/>

### **Massachusetts Commission Against Discrimination (MCAD)**

MCAD provides discrimination prevention training to the public and for workplaces. Training sessions range from two hours to four days in length, depending on the topics covered. They also offer Equal Employment Opportunity Certifications for individuals who currently provide, or seek to provide, employment discrimination prevention training,

conduct internal discrimination complaint investigations and/or respond to accommodation requests. For more information visit their website at:

<https://www.mass.gov/training-and-outreach>

### Massachusetts Office on Disability (MOD)

MOD's mission is to "bring about full and equal participation of people with disabilities in all aspects of life...in a manner that fosters dignity and self-determination. They have four areas of focus: 1) Providing Training; 2) Advocacy; 3) Monitoring; and 4) Resources. MOD provides training to various entities in a variety of formats on all topics related to the state and federal civil rights laws that govern disability discrimination. Topics may include but are not limited to: ADA, Fair Housing Act, Section 504 of the Rehabilitation Act, M.G.L. Chs. 151b and 272, Service Animals, Vocational Rehabilitation and Independent Living Services and Programs, and Architectural Access Regulations. MOD also provides architectural review/site visits, either through plan review or on-site visits to ensure compliance with the various building requirements specific to persons with disabilities. Training and Architectural Review/Site Visits can be requested at:

<http://www.mass.gov/anf/employment-equal-access-disability/disability-info-and-resources/education-and-training/customized-trainings.html>

### ADA Coordinator Certification Program

The ADA Coordinator Training Certification Program is offered by the University of Missouri and the Great Plain ADA Center. Classes are offered online and through trainings offered at various conferences the University hosts. Following the successful completion of the program, the participant will have the knowledge base essential to performing the role of an ADA Coordinator. Course and certification requirements can be found on their website:

<http://www.adacoordinator.org/?page=About>

### National ADA Symposium

This premier, national four-day event includes more than eighty breakout sessions on every aspect of ADA. It is a project of the ADA National Network and is organized and run by the Great Plains ADA Center. For more information about the Symposium visit:

<http://www.adasymposium.org/>

### New England ADA Center

New England ADA Center is one of 10 regional ADA Centers comprising the ADA National Network. They provide information, guidance and training on ADA tailored to meet the needs of business, government and individuals at local, regional and national levels. Their website has a clearing house of ADA training topics that are no cost web-based courses in addition to publications and best practices resources. Their website can be found at:

<https://www.newenglandada.org/>

## Interacting Effectively with Individuals with Disabilities

### TIPS FOR INTERACTING EFFECTIVELY WITH PEOPLE WHO HAVE DISABILITIES:

- **Don't make assumptions about the person or the disability.** Let the individual's actions and reactions guide your responses. If someone who is hard-of-hearing needs you to speak more loudly, wait until you are asked before raising your voice.
- Always **speak directly to the person with a disability**, not to a companion, assistant or sign language interpreter.
- **If the person does not understand you, try again.** You may want to rephrase what you are saying in shorter sentences or use less complex language. Similarly, if you don't understand what someone is

saying, ask them to repeat what they just said. Don't become anxious if you have to make repeated attempts at listening or speaking to ensure effective communication.

- **Do not assume that a person with a disability needs help.** If someone looks in need of help, it is always appropriate to offer assistance, with the understanding that the individual may not need any help and so will decline your offer. If your offer to assist is accepted, listen or ask for instructions before you act.
- **Become familiar with the Town's accessibility features,** so that you can direct individuals to accessible rest rooms, ramps or elevators, and accessible entrances and exits.
- **Become familiar with Medfield's accommodation procedures.** When people with disabilities ask for accommodations, they are not complaining. Rather, they are asking for what they need in order to participate fully and equally in a particular activity, service or program.
- **Respond courteously to all requests for accommodation.** If you cannot provide or authorize an accommodation, promptly relay the request to appropriate personnel who do have authority.

## TIPS ON USING PERSON-FIRST LANGUAGE

- **Do not refer to a person's disability unless it is relevant.**
- **Use "disability" rather than "handicap" to refer to a person's disability.**
  - It is okay to say that a person is handicapped by obstacles, such as architectural barriers or the attitudes of ignorant or insensitive people. Never use "cripple/crippled" in any reference to disability.
- **When referring to a person's disability, use "person first" language.**
  - In other words, when necessary, it is better to say "a person with a disability" rather than "a disabled person." Since "disabled" is an adjective, it is important to avoid ridiculous - and improper - constructions such as "disabled group" or "disabled transportation." Instead, build phrases using the word "disability."
- **Avoid referring to people with disabilities as by their disabilities (ex. "the blind").**
- **Descriptive terms should not be used as nouns.** Instead, when referring to someone's disability is essential to the conversation, use descriptive phrases.
- **Avoid negative or sensational descriptions of a person's disability.**
  - Don't say "suffers from," "a victim of," or "afflicted with." Don't refer to people with disabilities as "patients" unless they are receiving treatment in a medical facility. Never say "invalid." These portrayals elicit unwanted sympathy, or worse, pity toward individuals with disabilities. Respect and acceptance is what people with disabilities would rather have.
- **Don't portray people with disabilities as overly courageous, brave, special, or superhuman.** This implies that it is unusual for people with disabilities to have talents or skills.
- **Don't use "normal" to describe people who don't have disabilities.** It is better to say "people without disabilities" or "typical," if necessary, to make comparisons.
- **Never say "wheelchair-bound" or "confined to a wheelchair."**
  - People who use mobility or adaptive equipment are, if anything, afforded freedom and access that otherwise would be denied them.
  - It is, however, okay to use common expressions like "see you soon" or "I'd better be running along."
- **Relax. Anyone can make mistakes. Offer an apology if you forget some courtesy.**

## DISABILITY-SPECIFIC COMMUNICATION TIPS

### *When meeting a person with a disability that affects learning, intelligence, or brain function:*

- Keep your communication simple. Rephrase comments or questions for better clarity.
- Stay focused on the person as he or she responds to you.
- Allow the person time to tell or show you what he or she wants.

### *When meeting a person with a disability that affects speech:*

- Pay attention, be patient, and wait for the person to complete a word or thought. Do not finish it for the person.
- Ask the person to repeat what is said, if you do not understand. Tell the person what you heard and see if it is close to what he or she is saying.
- Be prepared for various devices or techniques used to enhance or augment speech. Don't be afraid to communicate with someone who uses an alphabet board or a computer with synthesized speech.

### *When you are with a person who uses a wheelchair or other mobility aid:*

- Do not push, lean on, or hold onto a person's wheelchair unless the person asks you to. The wheelchair is part of his or her personal space.
- Try to put yourself at eye level when talking with someone in a wheelchair. Sit or kneel in front of the person.
- Rearrange furniture or objects to accommodate a wheelchair before the person arrives.
- Offer to tell where accessible rest rooms, telephones, and water fountains are located.
- When giving directions to a person in a wheelchair, consider distance, weather conditions, and physical obstacles (curbs, stairs, steep hills, etc.)

### *Talking with a person who is deaf or uses a hearing aid:*

- Let the person take the lead in establishing the communication mode, such as lip-reading, sign language, or writing notes.
- Talk directly to the person, even when a sign language interpreter is present.
- If the person lip-reads, face him or her directly, speak clearly and with a moderate pace.
- With some people, it may help to simplify your sentences and use more facial expressions and body language.

### *Interacting with a person who is blind or has a disability that affects sight or vision:*

- When greeting the person, identify yourself and introduce others who may be present.
- Do not leave the person without excusing yourself first.
- When asked to guide someone with a sight disability, never push or pull the person. Allow him or her to take your arm, then walk slightly ahead. Point out doors, stairs, or curbs, as you approach them.
- As you enter a room with the person, describe the layout and location of furniture, etc.
- Be specific when describing the location of objects. (Example: "There is a chair three feet from you at eleven o'clock.")
- Do not pet or distract a guide dog. The dog is responsible for its owner's safety and is working. It is not a pet.



# APPENDIX